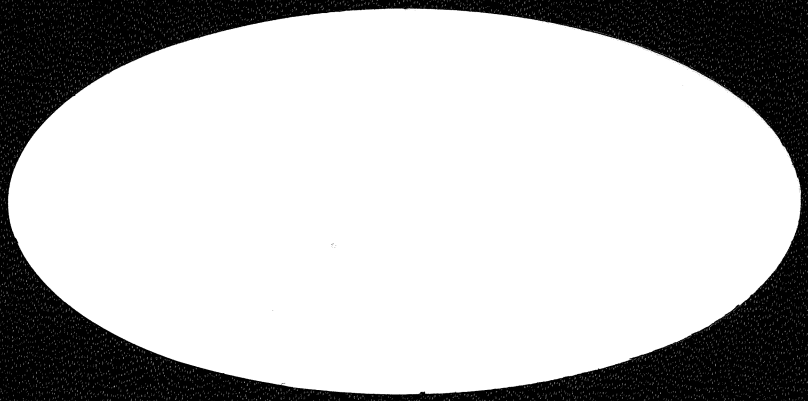

McDowell & Associates

Geotechnical Services
Environmental Services
Hydrogeological Services
Materials Testing & Inspection

RESPONSE ACTIVITY DOCUMENTATION
SELF-IMPLEMENTING ON-SITE CLEANUP AND DISPOSAL
OF PCB REMEDIATION WASTE
AREA OF PROPERTY WITH ELEVATED PCBs IN SOIL
PEERLESS METAL POWDERS & ABRASIVES
124 S. MILITARY STREET
DETROIT, WAYNE COUNTY, MICHIGAN

U.S. ENVIRONMENTAL PROTECTION AGENCY (US EPA)
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604
MAIL CODE LU-9J

AND

PEERLESS METAL POWDERS & ABRASIVES
124 S. MILITARY STREET
DETROIT, MICHIGAN 48209

McDOWELL & ASSOCIATES
21355 HATCHER AVENUE
FERNDALE, MICHIGAN 48220
Phone: (248) 399-2066
Fax: (248) 399-2157
www.mcdowasc.com

DECEMBER 30, 2014

McDowell & Associates

Geotechnical, Environmental & Hydrogeological Services • Materials Testing & Inspection

21355 Hatcher Avenue, Ferndale, MI 48220
Phone: (248) 399-2066 • Fax: (248) 399-2157

December 30, 2014

U.S. Environmental Protection Agency (US EPA)
77 W. Jackson Boulevard
Chicago, Illinois 60604
Mail Code LU-9J

Job No. 13-15111

Attention: Ms. Tamara Ohl

Subject: Response Activity Documentation
Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste
Area of Property with Elevated PCBs in Soil
Peerless Metal Powders & Abrasives
124 S. Military Street
Detroit, Wayne County, Michigan

Dear Ms. Ohl:

Pursuant to the request of Peerless Metal Powders & Abrasives, McDowell & Associates has completed this Response Activity Documentation for Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste for the subject property.

McDowell & Associates submitted a Cleanup Plan, dated September 9, 2013, to the US EPA as notification of the planned activities, in accordance with 40 CFR 761.61(a)(3). The Cleanup Plan was based on the "low-occupancy area" use of the property, with a deed restriction documenting the land use.

Contaminated soil was excavated by EQ Industrial Services (EQ) on May 14, 2014 and disposed at Wayne Disposal, Inc. in Belleville, Michigan. Based on manifests provided by EQ, approximately 64.49 tons of soil were disposed.

Following soil removal, McDowell & Associates collected eight verification soil samples from the excavation. Samples were collected in accordance with 40 CFR 761 Subpart 0. Additional samples were also collected to satisfy MDEQ Sampling Strategies and Statistics Training Materials for Part 201 Cleanup Criteria (S^3TM).

Confirmatory sample test results indicate the PCB contaminated area has been remediated to levels well below the US EPA approved cleanup objection of 25 ppm for "low-occupancy areas." Seven of eight samples did not show detectable PCBs. One sample showed a detectable PCB concentration of 3 ppm.

In accordance with the Cleanup Plan, a Declaration of Restrictive Covenant will be submitted to the Wayne County Register of Deeds documenting the cleanup area of the subject property as a "low occupancy area".

Background

The subject property is located at 124 W. Military Street in Detroit, Wayne County, Michigan. A Site Location Map, which shows the approximate location of the subject property, accompanies this letter as Attachment I. A legal description of the subject property accompanies this letter as Attachment II. A topographic map is included as Attachment III. Peerless Metal Powders & Abrasives purchased the property under land contract in November 2011.

The former area of the subject property with elevated PCBs is located in an exterior area near a parking lot on the office portion of the subject property. The area is vacant and unused. Use of this area by employees and visitors might include occasional traversing from the parking lot to the building, and would be considered a "low occupancy area" as defined in 40 CFR Part 761 – an area where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is...less than 335 hours (an average of 6.7 hours per week). In addition, the property is fenced to deter unintentional visitors to the property.

McDowell & Associates was provided a copy of a Historical Review and Limited Phase II Site Investigation Report, completed by AKT Peerless Environmental & Energy Services (AKT) on August 26, 2011 and a Supplemental Phase II Environmental Site Assessment (ESA) by AKT dated November 11, 2011.

Based on Sanborn Fire Insurance Maps included in the Historic Review, the subject property was occupied by a coal yard (1910), lumber yard (1923), and junk yard (1950-1978). Rail spurs were located to the north and residences were located to the south. A former gasoline UST was reportedly located northeast of the PCB-remediation area, and was closed in place in 1988.

Sampling and testing was conducted by AKT Peerless in 2011. Soil samples were reportedly placed in laboratory-supplied jars in accordance with the US EPA Publication SW-846, Testing Methods of Evaluating Solid Waste. Samples were analyzed using EPA Method 8082. McDowell & Associates did not complete independent sampling and testing at the subject property prior to November 2013.

Summarized below are soil sampling and PCB concentrations provided in AKT's reports for the subject property.

Sample ID	Date	PCB Concentration (ppm)	Sample ID	Date	PCB Concentration (ppm)
AKT-1 (8-9)	8/2/2011	8.5	TP-3 (8-9)	9/28/2011	<0.33
AKT-1 (10-10.5)	9/28/2011	<0.33	TP-4 (2-3)	9/28/2011	7.7
AKT-4 (2-2.5)	9/19/2011	<0.33	TP-4 (8-9)	9/28/2011	65
AKT-4 (8.5-9)	9/19/2011	1.2	TP-5 (2-3)	9/28/2011	<0.33
TP-2 (2-3)	9/28/2011	1.1	TP-5 (8-9)	9/28/2011	<0.33

Sample ID	Date	PCB Concentration (ppm)	Sample ID	Date	PCB Concentration (ppm)
TP-2 (8-9)	9/28/2011	<0.33	TP-7 (2-3)	9/28/2011	<0.33
TP-3 (2-3)	9/28/2011	2.4	TP-7 (8-9)	9/28/2011	<0.33

On November 22, 2013, McDowell & Associates completed three soil borings in the area for waste characterization testing to obtain landfill approval for disposal of waste.

Cleanup Plan

The Cleanup Plan proposed for the area with PCB-contaminated soil was prepared in accordance with 40 CFR 761 and included excavation of PCB contaminated soil and off-site disposal. The Cleanup Plan had been separated into two tasks:

1) Remove the soil with PCBs at concentrations exceeding 25 ppm (the cleanup level for bulk PCB remediation waste in low occupancy areas) for disposal at EQ as hazardous waste. Based on information provided by AKT, it was estimated that the area exceeding 50 ppm (at TP-4 – [8' - 9']) was approximately 10' by 10' and 10' deep.

   Following removal of that soil, McDowell & Associates will collect verification soil samples in accordance with 40 CFR 761 Subpart 0. Soil samples will be submitted to an accredited laboratory for testing to determine the presence of PCBs. If any of the verification soil samples exceed 50 ppm, additional soil will be removed for disposal at EQ and the process repeated until results are below 50 ppm.

2) Following removal as described above, a deed restriction will be placed on the property documenting the area of the subject property as a "low occupancy area".

The US EPA responded in a letter dated November 12, 2013, which approved the Cleanup Plan. A copy is attached.

Field Work

On May 14, 2014, McDowell & Associates observed Industrial Services (EQ) excavate an approximately 10' x 10' x 10' excavation in the reported area of AKT's TP-4. Soil was placed into lined trucks, transported by S & C Transport, and disposed at Wayne Disposal, Inc. in Belleville, Michigan. Based on manifests provided by EQ, approximately 64.49 tons of soil were disposed. Manifests are attached.

Following soil removal, McDowell & Associates collected eight verification soil samples, designated C-1 through C-8, from the excavation. Samples were collected in accordance with 40 CFR 761 Subpart 0. Additional samples were also collected to satisfy MDEQ Sampling

Strategies and Statistics Training Materials for Part 201 Cleanup Criteria (S^3TM). Samples were collected using a nitrile-gloved hand from soil within the excavated bucket. A Verification Soil Sample Location Map, which shows the approximate locations from which verification soil samples were collected, is attached.

Soil samples were placed in laboratory-provided, pre-cleaned glass jars and stored in an ice chest until delivery to a representative of Trace Analytical Laboratories, Inc. of Muskegon, Michigan for chemical testing. Sample chain-of-custody documentation is included with chemical test results.

Chemical Testing Program

Samples were subjected to tests to determine the presence of PCBs (Method 8082).

Chemical Test Results

PCBs were not detected in C-1 through C-5, C-7, or C-8.

PCBs were detected in C-6 (the north sidewall), at a concentration of 3.0 mg/kg, which is below the cleanup objective of 16mg/kg.

Chemical test results are attached.

Limitations

Nothing in this report constitutes a legal opinion or legal advice. It is suggested that environmental counsel be retained to evaluate site conditions and transaction-related issues from a legal perspective.

Property lines shown on maps are estimates and are limited by scale inaccuracies. The approximate boundaries shown on report attachments are not intended to be exact, but rather approximations to assist with review.

Conclusions

McDowell & Associates has completed this Response Activity Documentation for Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste for the subject property.

McDowell & Associates submitted a Cleanup Plan, dated September 9, 2013, to the US EPA as notification of the planned activities, in accordance with 40 CFR 761.61(a)(3). The Cleanup Plan was based on the "low-occupancy area" use of the property, with a deed restriction documenting the land use.

Contaminated soil was excavated by EQ Industrial Services (EQ) on May 14, 2014 and disposed at Wayne Disposal, Inc. in Belleville, Michigan. Based on manifests provided by EQ, approximately 64.49 tons of soil were disposed.

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Confirmatory sample test results indicate the PCB contaminated area has been remediated to levels well below the US EPA approved cleanup objection of 25 ppm for "low-occupancy areas." Seven of eight samples did not show detectable PCBs. One sample showed a detectable PCB concentration of 3 ppm.

A Declaration of Restrictive Covenant will be submitted to the Wayne County Register of Deeds documenting the cleanup area of the subject property as a "low occupancy area". A copy is attached.

If you have any questions regarding the information contained in this report, or if we can be of further service, please do not hesitate to call.

Very truly yours,

McDOWELL & ASSOCIATES

Jennifer Lagerbohm, M.S., CHMM
Senior Industrial Hygienist

Douglas M. McDowell, M.S., P.E.
Environmental Manager

JL/nm/ks/jb

Attachments

I - Site Location Map
II - Legal Description
III - Topographic Map
IV - Verification Soil Sample Location Map
V - US EPA Approval Letter, dated November 12, 2013
VI - Manifests
VII - Chemical Test Results and Chain-of-Custody Documentation
VIII - Deed Restriction

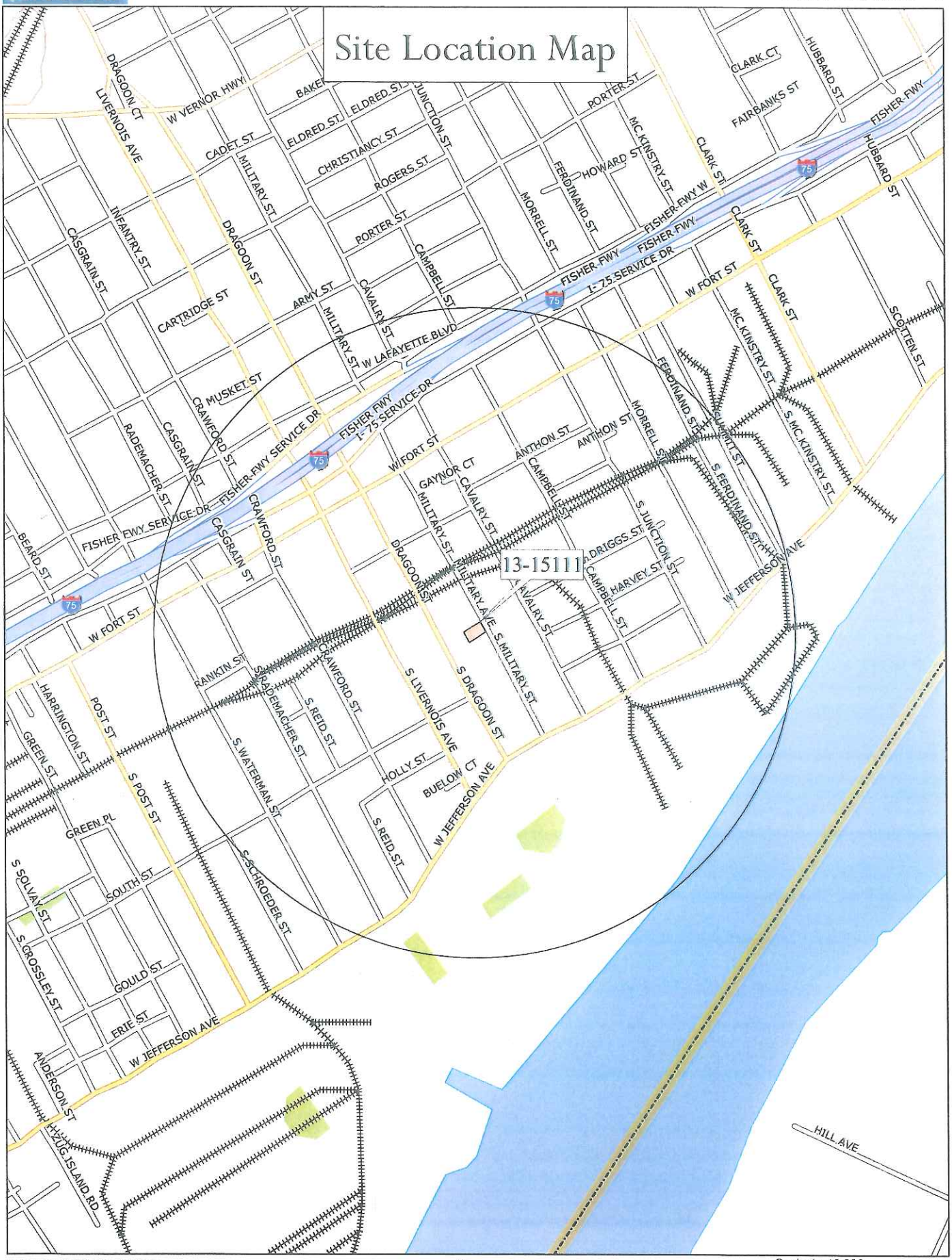
Attachment I

Site Location Map

DeLORME

Topo North America™ 9

Site Location Map



Data use subject to license.

© DeLorme. Topo North America™ 9.

www.delorme.com

TN

MN (7.5°W)

Scale 1 : 12,800

0 200 400 600 800 1000 ft

0 100 200 300 400 500 m

1" = 1,066.7 ft

Data Zoom 14-0

Attachment II

Legal Description

General Property Information

City of Detroit

[Back to Non-Printer Friendly Version] [Send To Printer]

Parcel: 16016505-6 **Unit:** CITY OF DETROIT

Flag: SEE ASSESSORS COMMENTS FOR CORRECT REN ZONE INFO

Property Address [collapse]

124 S MILITARY
DETROITMI48209

Owner Information [collapse]

PTDC PROPERTIES LLC
124 S MILITARY
DETROIT, MI 48209

Unit: 01

Taxpayer Information [collapse]

SEE OWNER INFORMATION

General Information for Tax Year 2014 [collapse]

Property Class:	301 - 301-INDUSTRIAL	**Assessed Value:**	$59,046
School District:	D - DETROIT SCHOOLS	**Taxable Value:**	$59,046
State Equalized Value:	$59,046	**Map #**	16
DISTRICT	5	**Date of Last Name Chg:**	10/10/2012
		Date Filed:	
		Notes:	N/A
Historical District:	N/A	**Census Block Group:**	N/A
Principal Residence Exemption	**June 1st**	**Final**	
2013	0.0000 %	0.0000 %	

Previous Year Info	MBOR Assessed	Final S.E.V.	Final Taxable
2013	$59,046	$59,046	$58,684
2012	$0	$0	$0
2011	$0	$0	$0

Land Information [collapse]

	Frontage		Depth
Lot 1:	0.00 Ft.		0.00 Ft.
Lot 2:	0.00 Ft.		0.00 Ft.
Lot 3:	0.00 Ft.		0.00 Ft.
Total Frontage:	0.00 Ft.	**Average Depth:**	0.00 Ft.

Total Acreage:	0.38		
Zoning Code:			
Total Estimated Land Value:	$18,447	**Mortgage Code:**	
Land Improvements:	$10,005	**Lot Dimensions/Comments:**	N/A
Renaissance Zone:	239 (Complies With Zone)		

Renaissance Zone Expiration Date:

Legal Information for 16016505-6 [collapse]

W MILITARY S 70 FT 128 AND 127, N 68 FT E 315 FT AND S 30 FT W 138.50 FT 72 ALSO 1/2 OF VACATED ALLEY DANIEL SCOTTEN SUB L9 P19 PLATS, W C R 16/8 (16,848 SQ FT)

Land Divison Act Information [collapse]

Date of Last Split/Combine:	10/10/2012	**Number of Splits Left:**	0
Date Form Filed:		**Unallocated Div.s of Parent:**	0
Date Created:	10/10/2012	**Unallocated Div.s Transferred:**	0
Acreage of Parent:	0.00	**Rights Were Transferred?**	NO
Split Number:	0	**Courtesy Split?**	NO
		Parent Parcel:	

Sales Information

1 sale record(s) found.

Sale Date	Sale Price	Instrument	Grantor	Grantee	Terms Of Sale	Liber/Page
11/14/2011	$1,150,000.00	PTA	NEWMAN, PHYLLIS	PTDC PROPERTIES, LLC	MULTIPLE ECF	

Note

MULTIPLE SALE-SEE COMMENTS

Building Information

2 building(s) found.

Description	Floor Area	Yr Built
Commercial/Industrial Building 1 - *Office Building*	1197 Sq. Ft.	1978

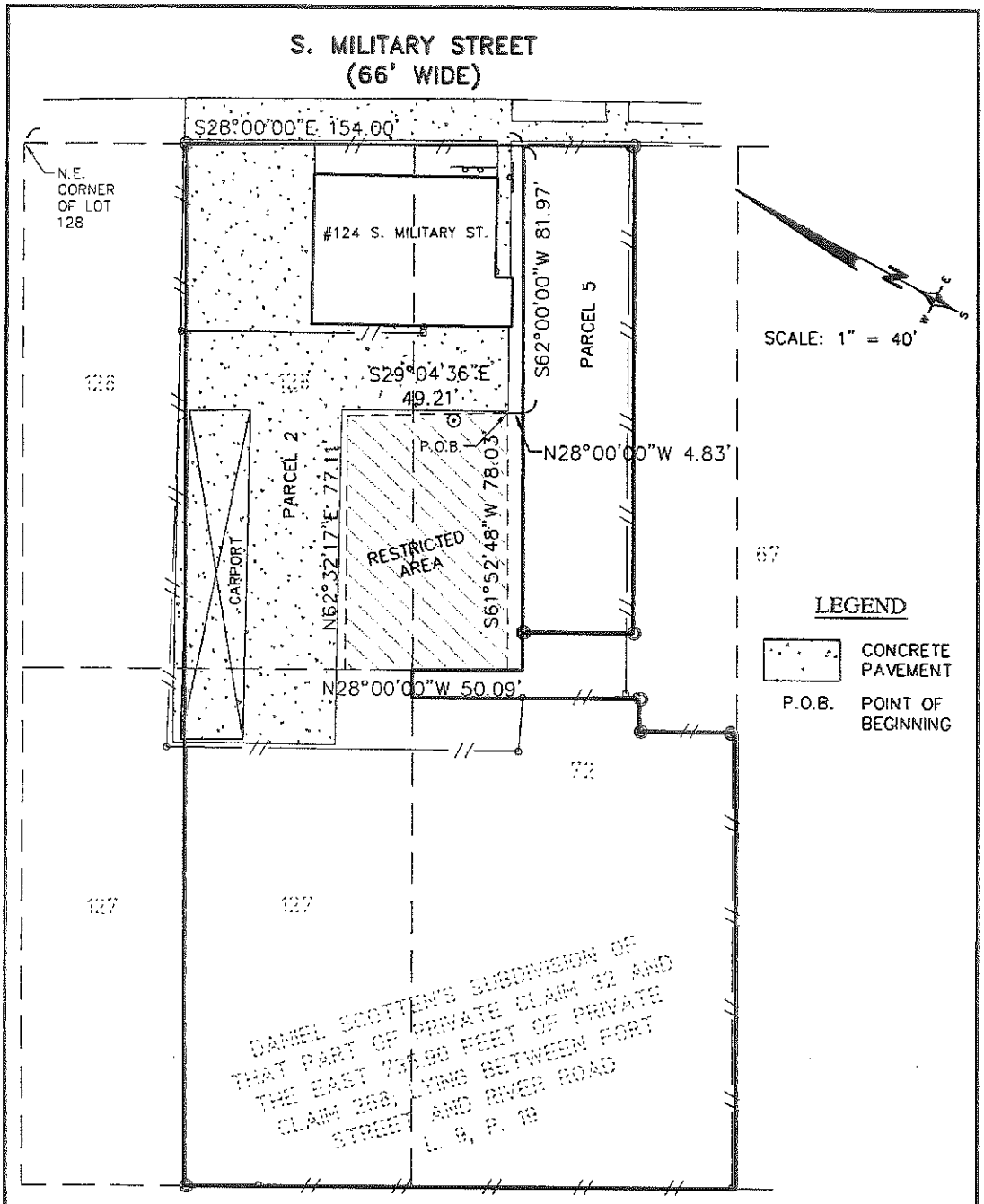
General Information

Floor Area:	1197 Sq. Ft.	**Estimated TCV:**	N/A
Occupancy:	Office Building	**Class:**	C
Stories Above Ground:	1	**Average Story Height:**	13
Basement Wall Height:	N/A		
Year Built:	1978	**Year Remodeled:**	0
Percent Complete:	100%	**Heat:**	Complete H.V.A.C
Physical Percent Good:	46%	**Functional Percent Good:**	100%
Economic Percent Good:	100%	**Effective Age:**	34 yrs.

Description	Floor Area	Yr Built
Commercial/Industrial Building 2 - *Office Building*	1503 Sq. Ft.	1988

General Information

Floor Area:	1503 Sq. Ft.	**Estimated TCV:**	N/A
Occupancy:	Office Building	**Class:**	C
Stories Above Ground:	1	**Average Story Height:**	13
Basement Wall Height:	N/A		
Year Built:	1988	**Year Remodeled:**	0
Percent Complete:	100%	**Heat:**	Package Heating & Cooling
Physical Percent Good:	62%	**Functional Percent Good:**	100%
Economic Percent Good:	100%	**Effective Age:**	24 yrs.



LEGAL DESCRIPTION OF A RESTRICTED AREA

AN AREA LOCATED IN THE CITY OF DETROIT, WAYNE COUNTY MICHIGAN, BEING MORE PARTICULARLY DESCRIBED AS:

COMMENCING AT THE N.E. CORNER OF LOT 128 OF DANIEL SCOTTEN'S SUBDIVISION OF THAT PART OF PRIVATE CLAIM 32 AND EAST 735.90 FEET OF PRIVATE CLAIM 268; LYING BETWEEN FORT STREET AND RIVER ROAD AS RECORDED IN LIBER 9 OF PLATS, PAGE 19, WAYNE COUNTY RECORDS; THENCE S. 28°00'00" E. 154.00 FEET ALONG THE WEST RIGHT OF WAY LINE OF SOUTH MILITARY STREET (66 FEET WIDE); THENCE S. 62°00'00" W. 81.97 FEET; THENCE N. 28°00'00" W. 4.83 FEET TO THE POINT OF BEGINNING OF SAID RESTRICTED AREA; THENCE S. 61°52'48" W. 78.03 FEET; THENCE N. 28°00'00" W. 50.09 FEET; THENCE N. 62°32'17" E. 77.11 FEET; THENCE S. 29°04'36" E. 49.21 FEET TO THE POINT OF BEGINNING, CONTAINING 3,851 SQUARE FEET.

REVISIONS		
ITEM	DATE	BY

RESTRICTED AREA
PEERLESS METAL
DETROIT MICHIGAN

ZEIMET WOZNIAK & ASSOCIATES
Civil Engineers & Land Surveyors
55800 GRAND RIVER AVE, SUITE 100
NEW HUDSON, MICHIGAN 48165
P: (248) 437-5099 F: (248) 437-5222 www.zeimetwozniak.com

DATE 12-17-14	SCALE HOR: 1" = 40'
	FIELD BOOK NO. 537
DESIGNED BY RH	JOB NO. 14159
DRAWN BY PTG	SHEET NO. 1/1

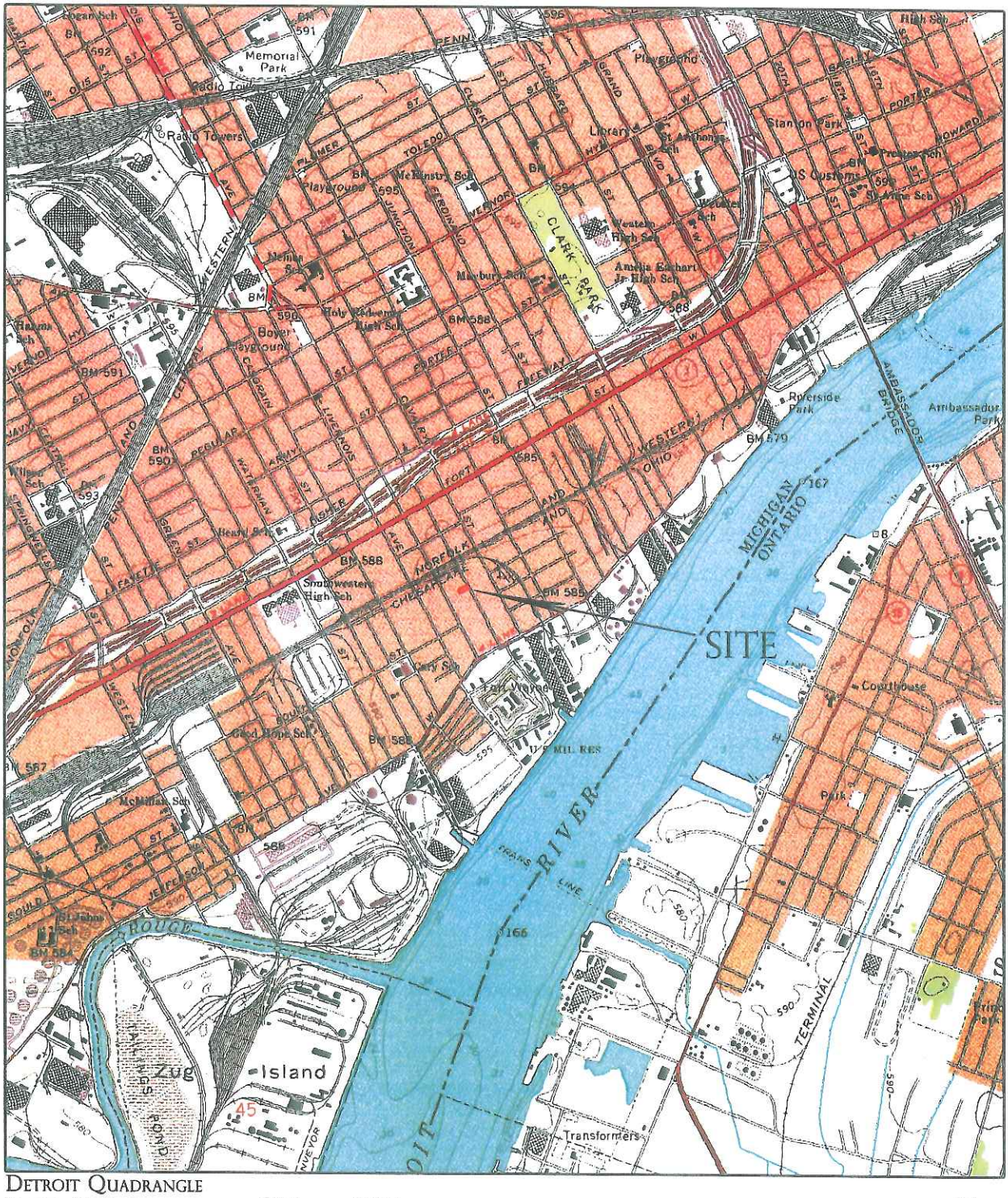
Attachment III

Topographic Map

McDowell & Associates

JOB NUMBER: 13-15111

1980 USGS TOPOGRAPHIC MAP



DETROIT QUADRANGLE
DATED 1968, PHOTOREVISED 1973 AND 1980

N

APPROXIMATE PROPERTY BOUNDARY

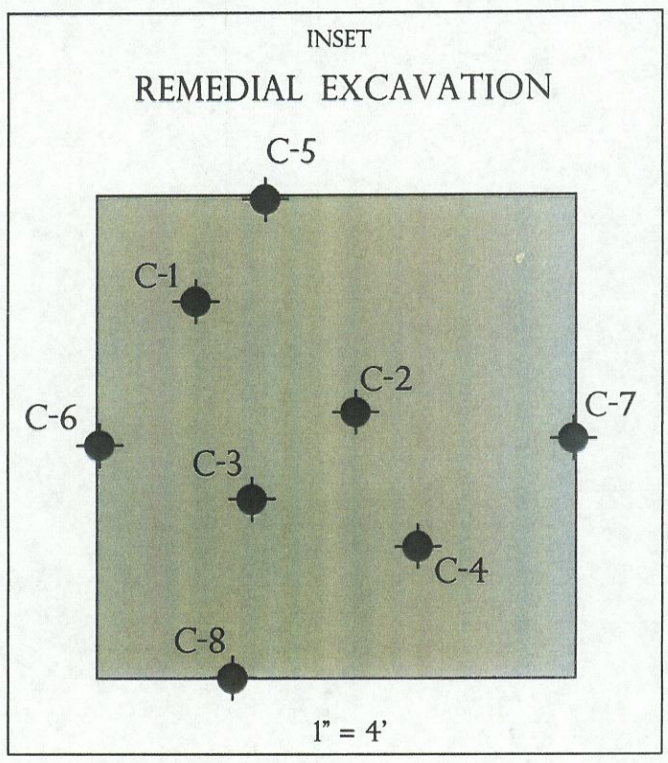
Attachment IV

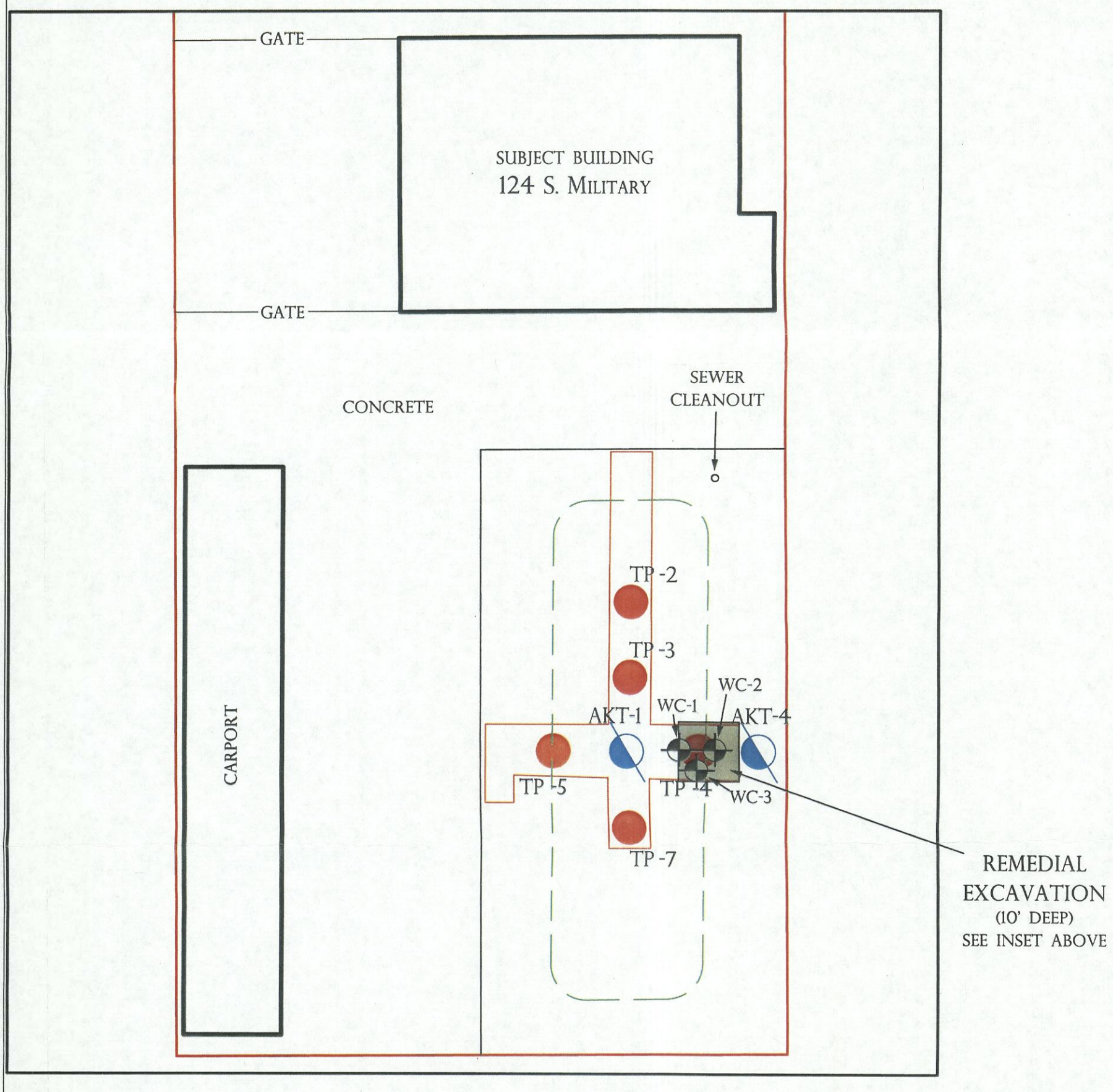
Verification Soil Sample Location Map

McDowell & Associates

JOB NUMBER: 13-15111

VERIFICATION SOIL SAMPLE LOCATION MAP





LEGEND

- TEST PIT BY AKT
- SOIL BORING BY AKT
- SOIL BORING BY M & A (Nov. 2013)
- VERIFICATION SOIL SAMPLE
- APPROXIMATE PROPERTY BOUNDARY

NOTES:

ALL LOCATIONS APPROXIMATE

N

1" = 20'

Attachment V

US EPA Approval Letter, dated November 12, 2013

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 12 2013

REPLY TO THE ATTENTION OF:

LU-9J

Via Certified Mail (7009 1680 0000 7671 3603)
Return Receipt Requested

Ms. Jennifer Lagerbohm
McDowell & Associates
21355 Hatcher Avenue
Ferndale, Michigan 48220

RE: Self-Implementing Polychlorinated Biphenyls (PCB) Cleanup:
Peerless Metal Powders
124 S. Military Street
Detroit, Michigan

Dear Ms. Lagerbohm,

We have completed our review of the September 9, 2013, notification and certification that you intend to conduct a self-implementing cleanup and disposal of PCB remediation waste in accordance with the requirements of 40 CFR 761.61(a). We received this notification on October 17, 2013. Based on our review, your notification is hereby approved, subject to the following conditions:

1. As stated in 40 CFR 761.61(a), you must conduct the cleanup in accordance with all applicable requirements of 40 CFR 761.61(a)(1) through (9). For your reference, the applicable regulations may be found at http://www.ecfr.gov. To assist you in completing the cleanup successfully, we have placed an "X" in the margin to identify specific requirements for which your notice is deficient in describing how you plan to comply. Specific comments about each of the deficient areas are noted in bold italics following the regulatory citation.

2. You must prepare a cleanup completion summary report that describes how you conducted the cleanup in accordance with the applicable regulatory requirements, including those marked with an "X" on the enclosure. You must send a copy to me within six months after the date of this letter.

3. If your cleanup activity includes the use of a fence or a cap that must be maintained in perpetuity, or if any portion of the site is cleaned up to the levels appropriate for low

occupancy areas, then you must notify us thirty days prior to any change in ownership of the property. Such notice must include the name, address and telephone number of the new owner, and the name of the new owner's contact person for this matter. You must also submit a letter, signed by the potential purchaser, stating whether it intends to maintain the fence or cap, and whether it plans to maintain the low occupancy land use, or whether it intends to remove and dispose of additional PCB-contaminated soils off-site instead.

Please note that this approval does not relieve you from your duty to comply with all other applicable federal, state, and local requirements. In addition, please note that if you wish to make any changes to your notification (including changes in the project schedule), then you must submit your proposal to Ms. Tamara Ohl, of my staff, in writing at least 14 calendar days prior to the proposed implementation of the change. If you have any questions, please contact her by e-mail at ohl.tamara@epa.gov or by telephone at (312) 886-0991.

Sincerely,

Jose G. Cisneros, Chief
Remediation and Reuse Branch

cc: Michigan Department of Environmental Quality
Wayne County Health Department

ENCLOSURE

Regulatory Requirements of 40 CFR 761.61(a)

Please note that an "X" in the margin [ ] indicates that the notification and certification of your intention to conduct a self-implementing cleanup does not adequately explain how you intend to comply with the regulatory requirement.

[ ] (1) ***Applicability***

(i) The self-implementing procedures may not be used to clean up:

(A) Surface or ground waters.

(B) Sediments in marine and freshwater ecosystems.

(C) Sewers or sewage treatment systems.

(D) Any private or public drinking water sources or distribution systems.

(E) Grazing lands.

(F) Vegetable gardens.

[ ] (ii) The self-implementing cleanup provisions shall not be binding upon cleanups conducted under other authorities, including but not limited to, actions conducted under section 104 or section 106 of CERCLA, or section 3004(u) and (v) or section 3008(h) of RCRA.

[ ] (2) ***Site characterization***. Any person conducting self-implementing cleanup of PCB remediation waste must characterize the site adequately to be able to provide the information required by paragraph (a)(3) of this section. Subpart N of this part provides a method for collecting new site characterization data or for assessing the sufficiency of existing site characterization data.

[ ] (3) ***Notification and certification***.

[ ] (i) At least 30 days prior to the date that the cleanup of a site begins, the person in charge of the cleanup or the owner of the property where the PCB remediation waste is located shall notify, in writing, the EPA Regional Administrator, the Director of the State or Tribal environmental protection agency, and the Director of the county or local environmental protection agency where the cleanup will be conducted. The notice shall include:

[ ] (A) The nature of the contamination, including kinds of materials contaminated.

[ ] (B) A summary of the procedures used to sample contaminated and adjacent areas and a table or cleanup site map showing PCB concentrations measured in all pre-cleanup characterization samples. The summary must include sample collection and analysis dates. The EPA Regional Administrator may require more detailed information including, but not limited to, additional characterization sampling or all sample identification numbers from all previous characterization activities at the cleanup site.

[X] (C) The location and extent of the identified contaminated area, including topographic maps with sample collection sites cross referenced to the sample identification numbers in the data summary from paragraph (a)(3)(i)(B) of this section.

A topographic map was not included in the plan. Please include this map in the cleanup report.

[X] (D) A cleanup plan for the site, including schedule, disposal technology, and approach. This plan should contain options and contingencies to be used if unanticipated higher concentrations or wider distributions of PCB remediation waste are found or other obstacles force changes in the cleanup approach.

A schedule for completion of cleanup was not included in the plan, therefore, provide a copy of the cleanup report to EPA within six months after the date of this letter.

[ ] (E) A written certification, signed by the owner of the property where the cleanup site is located and the party conducting the cleanup, that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file at the location designated in the certificate, and are available for EPA inspection. Persons using alternate methods for chemical extraction and chemical analysis for site characterization must include in the certificate a statement that such a method will be used and that a comparison study which meets or exceeds the requirements of subpart Q of this part, and for which records are on file, has been completed prior to verification sampling.

[ ] (ii) Within 30 calendar days of receiving the notification, the EPA Regional Administrator will respond in writing approving of the self-implementing cleanup, disapproving of the self-implementing cleanup, or requiring additional information. If the EPA Regional Administrator does not respond within 30 calendar days of receiving the notice, the person submitting the notification may assume that it is complete and acceptable and proceed with the cleanup according to the information the person provided to the EPA Regional Administrator. Once cleanup is underway, the person conducting the cleanup must provide any proposed changes from the notification to the EPA Regional Administrator in writing no less than 14 calendar days prior to the proposed implementation of the change. The EPA Regional Administrator will determine in his or her discretion whether to accept the change, and will respond to the change notification verbally within 7 calendar days and in writing within 14 calendar days of receiving it. If the EPA Regional Administrator does not respond verbally within 7 calendar days and in writing within 14 calendar days of receiving the change notice, the person who submitted it may deem it complete and acceptable and proceed with the cleanup according to the information in the change notice provided to the EPA Regional Administrator.

[ ] (iii) Any person conducting a cleanup activity may obtain a waiver of the 30-day notification requirement, if they receive a separate waiver, in writing, from each of the agencies they are required to notify under this section. The person must retain the original written waiver as required in paragraph (a)(9) of this section.

[ ] (4) ***Cleanup levels***. For purposes of cleaning, decontaminating, or removing PCB remediation waste under this section, there are four general waste categories: bulk PCB remediation waste, non-porous surfaces, porous surfaces, and liquids. Cleanup levels are based on the kind of material and the potential exposure to PCBs left after cleanup is completed.

[ ] (i) *Bulk PCB remediation waste*. Bulk PCB remediation waste includes, but is not limited to, the following non-liquid PCB remediation waste: soil, sediments, dredged materials, muds, PCB sewage sludge, and industrial sludge.

[ ] (A) *High occupancy areas*. The cleanup level for bulk PCB remediation waste in high occupancy areas is ≤1 ppm without further conditions. High occupancy areas where bulk PCB remediation waste remains at concentrations >1 ppm and ≤10 ppm shall be covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section.

[ ] (B) *Low occupancy areas*.

[ ] (1) The cleanup level for bulk PCB remediation waste in low occupancy areas is ≤25 ppm unless otherwise specified in this paragraph.

[ ] (2) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤50 ppm if the site is secured by a fence and marked with a sign including the M_L mark.

[ ] (3) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤100 ppm if the site is covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section.

[ ] (ii) *Non-porous surfaces*. In high occupancy areas, the surface PCB cleanup standard is ≤ 10 μg/100 cm^2 of surface area. In low occupancy areas, the surface cleanup standard is <100 μg/100 cm^2 of surface area. Select sampling locations in accordance with subpart P of this part or a sampling plan approved under paragraph (c) of this section.

[ ] (iii) *Porous surfaces.* In both high and low occupancy areas, any person disposing of porous surfaces must do so based on the levels in paragraph (a)(4)(i) of this section. Porous surfaces may be cleaned up for use in accordance with §761.79(b)(4) or §761.30(p).

[ ] (iv) *Liquids*. In both high and low occupancy areas, cleanup levels are the concentrations specified in §761.79(b)(1) and (b)(2).

[ ] (v) *Change in the land use for a cleanup site*. Where there is an actual or proposed change in use of an area cleaned up to the levels of a low occupancy area, and the exposure of people or animal life in or at that area could reasonably be expected to increase, resulting in a change in status from a low occupancy area to a high occupancy area, the owner of the area shall clean up the area in accordance with the high occupancy area cleanup levels in paragraphs (a)(4)(i) through (a)(4)(iv) of this section.

[ ] (vi) The EPA Regional Administrator, as part of his or her response to a notification submitted in accordance with §761.61(a)(3) of this part, may require cleanup of the site, or portions of it, to more stringent cleanup levels than are otherwise required in this section, based on the proximity to areas such as residential dwellings, hospitals, schools, nursing homes, playgrounds, parks, day care centers, endangered species habitats, estuaries, wetlands, national parks, national wildlife refuges, commercial fisheries, and sport fisheries.

[X] (5) ***Site cleanup.*** In addition to the options set out in this paragraph, PCB disposal technologies approved under §§761.60 and 761.70 are acceptable for on-site self-implementing PCB remediation waste disposal within the confines of the operating conditions of the respective approvals.

The plan references disposal at EQ as hazardous waste. Ensure the cleanup report includes a reference to the specific facility used for disposal.

[ ] (i) *Bulk PCB remediation waste*. Any person cleaning up bulk PCB remediation waste shall do so to the levels in paragraph (a)(4)(i) of this section.

[ ] (A) Any person cleaning up bulk PCB remediation waste on-site using a soil washing process may do so without EPA approval, subject to all of the following:

(1) A non-chlorinated solvent is used.
(2) The process occurs at ambient temperature.
(3) The process is not exothermic.
(4) The process uses no external heat.
(5) The process has secondary containment to prevent any solvent from being released to the underlying or surrounding soils or surface waters.
(6) Solvent disposal, recovery, and/or reuse is in accordance with relevant provisions of approvals issued according to paragraphs (b)(1) or (c) of this section or applicable paragraphs of §761.79.

[ ] (B) Bulk PCB remediation waste may be sent off-site for decontamination or disposal in accordance with this paragraph, provided the waste is either dewatered on-site or transported off-site in containers meeting the requirements of the DOT Hazardous Materials Regulations (HMR) at 49 CFR parts 171 through 180.

[ ] (1) Removed water shall be disposed of according to paragraph (b)(1) of this section.

[ ] (2) Any person disposing off-site of dewatered bulk PCB remediation waste shall do so as follows:

(i) Unless sampled and analyzed for disposal according to the procedures set out in §§761.283, 761.286, and 761.292, the bulk PCB remediation waste shall be assumed to contain ≥50 ppm PCBs.
(ii) Bulk PCB remediation wastes with a PCB concentration of <50 ppm shall be disposed of in accordance with paragraph (a)(5)(v)(A) of this section.
(iii) Bulk PCB remediation wastes with a PCB concentration ≥50 ppm shall be disposed of in a hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA, or a PCB disposal facility approved under this part.
(iv) The generator must provide written notice, including the quantity to be shipped and highest concentration of PCBs (using extraction EPA Method 3500B/3540C or Method 3500B/3550B followed by chemical analysis using EPA Method 8082 in SW-846 or methods validated under subpart Q of this part) at least 15 days before the first shipment of bulk PCB remediation waste from each cleanup site by the generator, to each off-site facility where the waste is destined for an area not subject to a TSCA PCB Disposal Approval.

[ ] (3) Any person may decontaminate bulk PCB remediation waste in accordance with §761.79 and return the waste to the cleanup site for disposal as long as the cleanup standards of paragraph (a)(4) of this section are met.

[ ] (ii) Non-porous surfaces. PCB remediation waste non-porous surfaces shall be cleaned on-site or off-site for disposal on-site, disposal off-site, or use, as follows:

[ ] (A) For on-site disposal, non-porous surfaces shall be cleaned on-site or off-site to the levels in paragraph (a)(4)(ii) of this section using:
(1) Procedures approved under §761.79.
(2) Technologies approved under §761.60(e).
(3) Procedures or technologies approved under paragraph (c) of this section.

[ ] (B) For off-site disposal, non-porous surfaces:
(1) Having surface concentrations <100 μg/100 cm^2 shall be disposed of in accordance with paragraph (a)(5)(i)(B)(2)(ii) of this section. Metal surfaces may be thermally decontaminated in accordance with §761.79(c)(6)(i).
(2) Having surface concentrations ≥100 μg/100 cm^2 shall be disposed of in accordance with paragraph (a)(5)(i)(B)(2)(iii) of this section. Metal surfaces may be thermally decontaminated in accordance with §761.79(c)(6)(ii).

[ ] (C) For use, non-porous surfaces shall be decontaminated on-site or off-site to the standards specified in §761.79(b)(3) or in accordance with §761.79(c).

[ ] (iii) *Porous surfaces.* Porous surfaces shall be disposed on-site or off-site as bulk PCB remediation waste according to paragraph (a)(5)(i) of this section or decontaminated for use according to §761.79(b)(4), as applicable.

[ ] (iv) *Liquids.* Any person disposing of liquid PCB remediation waste shall either:

(A) Decontaminate the waste to the levels specified in §761.79(b)(1) or (b)(2).
(B) Dispose of the waste in accordance with paragraph (b) of this section or an approval issued under paragraph (c) of this section.

[ ] (v) *Cleanup wastes.* Any person generating the following wastes during and from the cleanup of PCB remediation waste shall dispose of or reuse them using one of the following methods:

[ ] (A) Non-liquid cleaning materials and personal protective equipment waste at any concentration, including non-porous surfaces and other non-liquid materials such as rags, gloves, booties, other disposable personal protective equipment, and similar materials resulting from cleanup activities shall be either decontaminated in accordance with §761.79(b) or (c), or disposed of in one of the following facilities, without regard to the requirements of subparts J and K of this part:
(1) A facility permitted, licensed, or registered by a State to manage municipal solid waste subject to part 258 of this chapter.
(2) A facility permitted, licensed, or registered by a State to manage non-municipal non-hazardous waste subject to §§257.5 through 257.30 of this chapter, as applicable.

(3) A hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA.
(4) A PCB disposal facility approved under this part.

[ ] (B) Cleaning solvents, abrasives, and equipment may be reused after decontamination in accordance with §761.79.

[ ] (6) ***Cleanup verification*** —

[X] (i) *Sampling and analysis.* Any person collecting and analyzing samples to verify the cleanup and on-site disposal of bulk PCB remediation wastes and porous surfaces must do so in accordance with subpart O of this part. Any person collecting and analyzing samples from non-porous surfaces must do so in accordance with subpart P of this part. Any person collecting and analyzing samples from liquids must do so in accordance with §761.269. Any person conducting interim sampling during PCB remediation waste cleanup to determine when to sample to verify that cleanup is complete, may use PCB field screening tests.

The Plan references completing verification sampling in accordance with subpart O, however does not describe the sampling. Ensure that verification sampling is completed in accordance with this subpart and documented in the report.

[ ] (ii) *Verification.*
(A) Where sample analysis results in a measurement of PCBs less than or equal to the levels specified in paragraph (a)(4) of this section, self-implementing cleanup is complete.
(B) Where sample analysis results in a measurement of PCBs greater than the levels specified in paragraph (a)(4) of this section, self-implementing cleanup of the sampled PCB remediation waste is not complete. The owner or operator of the site must either dispose of the sampled PCB remediation waste, or reclean the waste represented by the sample and reinitiate sampling and analysis in accordance with paragraph (a)(6)(i) of this section.

[ ] (7) ***Cap requirements.*** A cap means, when referring to on-site cleanup and disposal of PCB remediation waste, a uniform placement of concrete, asphalt, or similar material of minimum thickness spread over the area where remediation waste was removed or left in place in order to prevent or minimize human exposure, infiltration of water, and erosion. Any person designing and constructing a cap must do so in accordance with §264.310(a) of this chapter, and ensure that it complies with the permeability, sieve, liquid limit, and plasticity index parameters in §761.75(b)(1)(ii) through (b)(1)(v). A cap of compacted soil shall have a minimum thickness of 25 cm (10 inches). A concrete or asphalt cap shall have a minimum thickness of 15 cm (6inches). A cap must be of sufficient strength to maintain its effectiveness and integrity during the use of the cap surface which is exposed to the environment. A cap shall not be contaminated at a level ≥1 ppm PCB per Aroclor (or equivalent) or per congener. Repairs shall begin within 72 hours of discovery for any breaches which would impair the integrity of the cap.

[ ] (8) *Deed restrictions for caps, fences and low occupancy areas*. When a cleanup activity conducted under this section includes the use of a fence or a cap, the owner of the site must maintain the fence or cap, in perpetuity. In addition, whenever a cap, or the procedures and requirements for a low occupancy area, is used, the owner of the site must meet the following conditions:

[ ] (i) Within 60 days of completion of a cleanup activity under this section, the owner of the property shall:

[ ] (A) Record, in accordance with State law, a notation on the deed to the property, or on some other instrument which is normally examined during a title search, that will in perpetuity notify any potential purchaser of the property:

(1) That the land has been used for PCB remediation waste disposal and is restricted to use as a low occupancy area as defined in §761.3.

(2) Of the existence of the fence or cap and the requirement to maintain the fence or cap.

(3) The applicable cleanup levels left at the site, inside the fence, and/or under the cap.

[ ] (B) Submit a certification, signed by the owner, that he/she has recorded the notation specified in paragraph (a)(8)(i)(A) of this section to the EPA Regional Administrator.

[ ] (ii) The owner of a site being cleaned up under this section may remove a fence or cap after conducting additional cleanup activities and achieving cleanup levels, specified in paragraph (a)(4) of this section, which do not require a cap or fence. The owner may remove the notice on the deed no earlier than 30 days after achieving the cleanup levels specified in this section which do not require a fence or cap.

[ ] (9) ***Recordkeeping***. For paragraphs (a)(3), (a)(4), and (a)(5) of this section, recordkeeping is required in accordance with §761.125(c)(5).

Attachment VI

Manifests

013193510JJK

S/C 235

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	MIG 000 031 358	1	734 968 9101	013193510 JJK

GENERATOR

5. Generator's Name and Mailing Address: PEERLESS METAL POWDERS
124 S MILITARY ST.
DETROIT, MI 48209
Generator's Phone:

Generator's Site Address (if different than mailing address):
124 S MILITARY ST.
DETROIT, MI 48209

6. Transporter 1 Company Name: EQ INDUSTRIAL SERVICES — U.S. EPA ID Number: MID 000 263 871

7. Transporter 2 Company Name: S&C TRANSPORT — U.S. EPA ID Number: MIK 126399 684

8. Designated Facility Name and Site Address: WAYNE DISPOSAL, INC. SITE #2 LANDFILL
49350 N I-94 SERVICE DRIVE
BELLEVILLE, MI 48111
Facility's Phone: (800) 592-5489
U.S. EPA ID Number: MID 048 090 633

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. UN3432, Polychlorinated biphenyls, solid, 9, PGII, ERG #171	1	DT	43,500	KG	PCB1		
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
1. L137247WDI / PCB SOILS
Storage Start Date: 5-14-14
Unique Container ID: C51414-1

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: David J Carter — Signature: [signature] — Month: 5 Day: 14 Year: 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Roger Landers — Signature: [signature] — Month: 5 Day: 14 Year: 14

Transporter 2 Printed/Typed Name: — Signature: — Month: Day: Year:

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
PCB			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Zach Lyons — Signature: [signature] — Month: 5 Day: 14 Year: 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

13193511JJK

67040 S;C 135/142

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	MIG 000 031 358	1	734 968 9101	013193511 JJK

GENERATOR

5. Generator's Name and Mailing Address: PEERLESS METAL POWDERS
124 S MILITARY ST.
DETROIT, MI 48209

Generator's Site Address (if different than mailing address):
124 S MILITARY ST.
DETROIT, MI 48209

Generator's Phone:

6. Transporter 1 Company Name: EQ INDUSTRIAL SERVICES — U.S. EPA ID Number: MIO 000 263 871

7. Transporter 2 Company Name: S & C TRANSPORT — U.S. EPA ID Number: MIK 126399 684

8. Designated Facility Name and Site Address: WAYNE DISPOSAL, INC. SITE #2 LANDFILL
49350 N I-94 SERVICE DRIVE
BELLEVILLE, MI 48111
U.S. EPA ID Number: MID 048 090 633
Facility's Phone: (800) 592-5489

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3432, Polychlorinated biphenyls, solid, 9, PGII, ERG #171	1	CM DT	15,000	K	PCB
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1. L137247WDI / PCB SOILS
Storage Start Date: 5-12-14
Unique Container ID: 05141-2

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: David J Carter — Signature: [signature] — Month: 5 Day: 14 Year: 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Roger Landers — Signature: [signature] — Month: 5 Day: 14 Year: 14

Transporter 2 Printed/Typed Name: — Signature: — Month: Day: Year:

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
PCB			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Zach Lalva — Signature: [signature] — Month: 5 Day: 11 Year: 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Approval: L137247WDI
Receipt Status: All
Trans Mode (Inbound/Outbound): Both
Bulk Mode (Bulk/Non-Bulk): Both

Receipt List

Wayne Disposal, Inc.

0 Wayne Disposal, Inc.

Receipt ID	Manifest/BOL / Commingled	Customer		Generator	Waste Stream	Approval / Product TSDF Approval	Waste Code	Bill Unit	Qty Rec.	Status	Fpr. Status / Outbound	Rec. Date
1238370-1	013193510JJK	99999	EQIS MRD	MIG000031358	PEERLESS METAL POWDE	L137247WDI	PCB1	TONS	48.20	Accepted	Accepted	5/14/2014
1238370-2	013193510JJK	99999	EQIS MRD	MIG000031358	PEERLESS METAL POWDE	L137247WDI		TONS	48.20	Accepted	Accepted	5/14/2014
1238402-1	013193511JJK	99999	EQIS MRD	MIG000031358	PEERLESS METAL POWDE	L137247WDI	PCB1	TONS	16.29	Accepted	Accepted	5/14/2014
1238402-2	013193511JJK	99999	EQIS MRD	MIG000031358	PEERLESS METAL POWDE	L137247WDI		TONS	16.29	Accepted	Accepted	5/14/2014
						Total quantity for bill unit TONS:			**128.98**			

Attachment VII

Chemical Test Results and Chain-of-Custody Documentation

TRACE
the science of compliance

phone 231.773.5998
toll-free 800.733.5998
fax 231.773.6537

Trace Analytical Laboratories, Inc.
2241 Black Creek Road
Muskegon, MI 49444-2673
info@trace-labs.com
www.trace-labs.com

May 15, 2014

Ms. Jennifer Lagerbohm
McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

Phone: (248) 399-2066
Fax: (248) 399-2157

RE: Trace Project T14E233
Client Project 13-15111

Dear Ms. Lagerbohm:

Enclosed are your analytical results. The results of this report relate only to the samples listed in the body of this report.

All reports were examined through Trace's validation process to ensure that requirements for quality and completeness were satisfied. All reported analytical results were obtained in accordance with the methods referenced on the reports. Every practical effort was made to meet the reporting limit specifications for this work, however, some results may have raised reporting limits to correct for percent solids.

For clients that require NELAC Accreditation, Trace certifies that these test results meet all requirements of the NELAC Standard, except for those analytes with a "N" notation. These analytes have not been evaluated by NELAC at Trace's discretion and will not be reported unless requested by client.

If you have questions concerning this report, please contact me at 231.773.5998 or by email at jmink@trace-labs.com.

Sincerely,

Jon Mink
Senior Project Manager
Enclosures

TRACE
the science of compliance

phone 231.773.5998
toll-free 800.733.5998
fax 231.773.6537

Trace Analytical Laboratories, Inc.
2241 Black Creek Road
Muskegon, MI 49444-2673
info@trace-labs.com
www.trace-labs.com

SAMPLE SUMMARY

Trace Project ID: T14E233
Client Project ID: 13-15111

Trace ID	Sample ID	Matrix	Collected By	Date Collected	Date Received
T14E233-01	C-1	Soil	jl	05/14/14 13:00	05/14/14 13:35
T14E233-02	C-2	Soil	jl	05/14/14 13:00	05/14/14 13:35
T14E233-03	C-3	Soil	jl	05/14/14 13:00	05/14/14 13:35
T14E233-04	C-4	Soil	jl	05/14/14 13:00	05/14/14 13:35
T14E233-05	C-5	Soil	jl	05/14/14 13:00	05/14/14 13:35
T14E233-06	C-5D	Soil	jl	05/14/14 13:00	05/14/14 13:35
T14E233-07	C-6	Soil	jl	05/14/14 13:00	05/14/14 13:35
T14E233-08	C-7	Soil	jl	05/14/14 13:00	05/14/14 13:35
T14E233-09	C-8	Soil	jl	05/14/14 13:30	05/14/14 13:35

CERTIFICATE OF ANALYSIS

TRACE
the science of compliance

phone 231.773.5998
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fax 231.773.6537

Trace Analytical Laboratories, Inc.
2241 Black Creek Road
Muskegon, MI 49444-2673
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AN EXPLANATION OF TERMS AND SYMBOLS WHICH MAY OCCUR IN THIS REPORT

DEFINITIONS

LCS	Laboratory Control Sample
LCSD	Laboratory Control Sample Duplicate
MS	Matrix Spike
MSD	Matrix Spike Duplicate
RPD	Relative Percent Difference
DUP	Matrix Duplicate
RDL	Reporting Detection Limit
MCL	Maximum Contamination Limit
TIC	Tentatively Identified Compound
<, ND or U	Indicates the compound was analyzed for but not detected
*	Indicates a result that exceeds its associated MCL or Surrogate control limits
N	Indicates that the compound has not been evaluated by NELAC
NA	Indicates that the compound is not available.

NOTE: Samples for volatiles that have been extracted with a water miscible solvent were corrected for the total volume of the solvent/water mixture.

DATA QUALIFIERS

Trace ID: T14E233-07

Analysis: EPA 8082

Aroclor-1016	Note 413 : The reporting limit was raised due to a dilution because of high analyte concentrations.
Aroclor-1221	Note 413 : The reporting limit was raised due to a dilution because of high analyte concentrations.
Aroclor-1232	Note 413 : The reporting limit was raised due to a dilution because of high analyte concentrations.
Aroclor-1242	Note 413 : The reporting limit was raised due to a dilution because of high analyte concentrations.
Aroclor-1248	Note 413 : The reporting limit was raised due to a dilution because of high analyte concentrations.
Aroclor-1260	Note 413 : The reporting limit was raised due to a dilution because of high analyte concentrations.

CERTIFICATE OF ANALYSIS

TRACE
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toll-free 800.733.5998
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Trace Analytical Laboratories, Inc.
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Muskegon, MI 49444-2673
info@trace-labs.com
www.trace-labs.com

ANALYTICAL RESULTS

Trace Project ID: T14E233
Client Project ID: 13-15111

Trace ID: T14E233-01 Date Collected: 05/14/14 13:00 Matrix: Soil
Sample ID: C-1 Date Received: 05/14/14 13:35

PARAMETERS	RESULTS	UNITS	RDL	DILUTION	PREPARED	BY	ANALYZED	BY	NOTES	MCL
PESTICIDES/PCBS										
Analysis Method: EPA 8082										
Batch: T045152										
Aroclor-1016	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1221	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1232	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1242	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1248	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1254	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1260	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Surrogates:										
Tetrachloro-m-xylene	80	%	40-113	1	05/15/14	kb	05/15/14	tml	N	
Decachlorobiphenyl	79	%	32-111	1	05/15/14	kb	05/15/14	tml	N	
WET CHEMISTRY										
Analysis Method: ASTM D2974-87										
Batch: T045155										
% Solids	**82**	**% by Wt.**	**0.10**	**1**	**05/15/14**	**sv**	**05/15/14**	**sv**	N	

TRACE
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www.trace-labs.com

ANALYTICAL RESULTS

Trace Project ID: T14E233
Client Project ID: 13-15111

Trace ID: T14E233-02 Date Collected: 05/14/14 13:00 Matrix: Soil
Sample ID: C-2 Date Received: 05/14/14 13:35

PARAMETERS	RESULTS	UNITS	RDL	DILUTION	PREPARED	BY	ANALYZED	BY	NOTES	MCL
PESTICIDES/PCBS										
Analysis Method: EPA 8082										
Batch: T045152										
Aroclor-1016	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1221	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1232	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1242	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1248	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1254	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1260	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Surrogates:										
Tetrachloro-m-xylene	50	%	40-113	1	05/15/14	kb	05/15/14	tml	N	
Decachlorobiphenyl	48	%	32-111	1	05/15/14	kb	05/15/14	tml	N	
WET CHEMISTRY										
Analysis Method: ASTM D2974-87										
Batch: T045155										
% Solids	**83**	**% by Wt.**	**0.10**	**1**	**05/15/14**	**sv**	**05/15/14**	**sv**	N	

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www.trace-labs.com

ANALYTICAL RESULTS

Trace Project ID: T14E233
Client Project ID: 13-15111

Trace ID: T14E233-03 Date Collected: 05/14/14 13:00 Matrix: Soil
Sample ID: C-3 Date Received: 05/14/14 13:35

PARAMETERS	RESULTS UNITS	RDL	DILUTION	PREPARED	BY	ANALYZED	BY	NOTES	MCL
PESTICIDES/PCBS									
Analysis Method: EPA 8082									
Batch: T045152									
Aroclor-1016	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1221	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1232	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1242	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1248	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1254	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1260	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Surrogates:									
Tetrachloro-m-xylene	63 %	40-113	1	05/15/14	kb	05/15/14	tml	N	
Decachlorobiphenyl	70 %	32-111	1	05/15/14	kb	05/15/14	tml	N	
WET CHEMISTRY									
Analysis Method: ASTM D2974-87									
Batch: T045155									
% Solids	**81 % by Wt.**	**0.10**	**1**	**05/15/14**	**sv**	**05/15/14**	**sv**	N	

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ANALYTICAL RESULTS

Trace Project ID: T14E233
Client Project ID: 13-15111

Trace ID: T14E233-04 Date Collected: 05/14/14 13:00 Matrix: Soil
Sample ID: C-4 Date Received: 05/14/14 13:35

PARAMETERS	RESULTS	UNITS	RDL	DILUTION	PREPARED	BY	ANALYZED	BY	NOTES	MCL
PESTICIDES/PCBS										
Analysis Method: EPA 8082										
Batch: T045152										
Aroclor-1016	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1221	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1232	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1242	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1248	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1254	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1260	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Surrogates:										
Tetrachloro-m-xylene	57	%	40-113	1	05/15/14	kb	05/15/14	tml	N	
Decachlorobiphenyl	50	%	32-111	1	05/15/14	kb	05/15/14	tml	N	
WET CHEMISTRY										
Analysis Method: ASTM D2974-87										
Batch: T045155										
% Solids	**78**	**% by Wt.**	**0.10**	**1**	**05/15/14**	**sv**	**05/15/14**	**sv**	N	

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ANALYTICAL RESULTS

Trace Project ID: T14E233
Client Project ID: 13-15111

Trace ID: T14E233-05 Date Collected: 05/14/14 13:00 Matrix: Soil
Sample ID: C-5 Date Received: 05/14/14 13:35

PARAMETERS	RESULTS UNITS	RDL	DILUTION	PREPARED	BY	ANALYZED	BY	NOTES	MCL
PESTICIDES/PCBS									
Analysis Method: EPA 8082									
Batch: T045152									
Aroclor-1016	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1221	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1232	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1242	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1248	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1254	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1260	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Surrogates:									
Tetrachloro-m-xylene	61 %	40-113	1	05/15/14	kb	05/15/14	tml	N	
Decachlorobiphenyl	62 %	32-111	1	05/15/14	kb	05/15/14	tml	N	
WET CHEMISTRY									
Analysis Method: ASTM D2974-87									
Batch: T045155									
% Solids	**84 % by Wt.**	**0.10**	**1**	**05/15/14**	**sv**	**05/15/14**	**sv**	N	

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ANALYTICAL RESULTS

Trace Project ID: T14E233
Client Project ID: 13-15111

Trace ID: T14E233-06 Date Collected: 05/14/14 13:00 Matrix: Soil
Sample ID: C-5D Date Received: 05/14/14 13:35

PARAMETERS	RESULTS	UNITS	RDL	DILUTION	PREPARED	BY	ANALYZED	BY	NOTES	MCL
PESTICIDES/PCBS										
Analysis Method: EPA 8082										
Batch: T045152										
Aroclor-1016	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1221	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1232	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1242	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1248	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1254	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1260	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Surrogates:										
Tetrachloro-m-xylene	49	%	40-113	1	05/15/14	kb	05/15/14	tml	N	
Decachlorobiphenyl	63	%	32-111	1	05/15/14	kb	05/15/14	tml	N	
WET CHEMISTRY										
Analysis Method: ASTM D2974-87										
Batch: T045155										
% Solids	**85**	**% by Wt.**	**0.10**	**1**	**05/15/14**	**sv**	**05/15/14**	**sv**	N	

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ANALYTICAL RESULTS

Trace Project ID: T14E233
Client Project ID: 13-15111

Trace ID: T14E233-07 Date Collected: 05/14/14 13:00 Matrix: Soil
Sample ID: C-6 Date Received: 05/14/14 13:35

PARAMETERS	RESULTS UNITS	RDL	DILUTION	PREPARED	BY	ANALYZED	BY	NOTES	MCL
PESTICIDES/PCBS									
Analysis Method: EPA 8082									
Batch: T045152									
Aroclor-1016	<400 ug/kg dry	400	5	05/15/14	kb	05/15/14	tml	413	
Aroclor-1221	<400 ug/kg dry	400	5	05/15/14	kb	05/15/14	tml	413	
Aroclor-1232	<400 ug/kg dry	400	5	05/15/14	kb	05/15/14	tml	413	
Aroclor-1242	<400 ug/kg dry	400	5	05/15/14	kb	05/15/14	tml	413	
Aroclor-1248	<400 ug/kg dry	400	5	05/15/14	kb	05/15/14	tml	413	
Aroclor-1254	**3000 ug/kg dry**	**400**	**5**	**05/15/14**	**kb**	**05/15/14**	**tml**		
Aroclor-1260	<400 ug/kg dry	400	5	05/15/14	kb	05/15/14	tml	413	
Surrogates:									
Tetrachloro-m-xylene	72 %	40-113	5	05/15/14	kb	05/15/14	tml	N	
Decachlorobiphenyl	68 %	32-111	5	05/15/14	kb	05/15/14	tml	N	
WET CHEMISTRY									
Analysis Method: ASTM D2974-87									
Batch: T045155									
% Solids	**83 % by Wt.**	**0.10**	**1**	**05/15/14**	**sv**	**05/15/14**	**sv**	N	

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ANALYTICAL RESULTS

Trace Project ID: T14E233
Client Project ID: 13-15111

Trace ID: T14E233-08 Date Collected: 05/14/14 13:00 Matrix: Soil
Sample ID: C-7 Date Received: 05/14/14 13:35

PARAMETERS	RESULTS	UNITS	RDL	DILUTION	PREPARED	BY	ANALYZED	BY	NOTES	MCL
PESTICIDES/PCBS										
Analysis Method: EPA 8082										
Batch: T045152										
Aroclor-1016	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1221	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1232	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1242	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1248	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1254	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1260	<330	ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Surrogates:										
Tetrachloro-m-xylene	72	%	40-113	1	05/15/14	kb	05/15/14	tml	N	
Decachlorobiphenyl	46	%	32-111	1	05/15/14	kb	05/15/14	tml	N	
WET CHEMISTRY										
Analysis Method: ASTM D2974-87										
Batch: T045155										
% Solids	**83**	**% by Wt.**	**0.10**	**1**	**05/15/14**	**sv**	**05/15/14**	**sv**	N	

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ANALYTICAL RESULTS

Trace Project ID: T14E233
Client Project ID: 13-15111

Trace ID: T14E233-09 Date Collected: 05/14/14 13:30 Matrix: Soil
Sample ID: C-8 Date Received: 05/14/14 13:35

PARAMETERS	RESULTS UNITS	RDL	DILUTION	PREPARED	BY	ANALYZED	BY	NOTES	MCL
PESTICIDES/PCBS									
Analysis Method: EPA 8082									
Batch: T045152									
Aroclor-1016	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1221	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1232	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1242	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1248	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1254	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Aroclor-1260	<330 ug/kg dry	330	1	05/15/14	kb	05/15/14	tml		
Surrogates:									
Tetrachloro-m-xylene	70 %	40-113	1	05/15/14	kb	05/15/14	tml	N	
Decachlorobiphenyl	68 %	32-111	1	05/15/14	kb	05/15/14	tml	N	
WET CHEMISTRY									
Analysis Method: ASTM D2974-87									
Batch: T045155									
% Solids	**82 % by Wt.**	**0.10**	**1**	**05/15/14**	**sv**	**05/15/14**	**sv**	N	

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QUALITY CONTROL RESULTS

Trace Project ID: T14E233
Client Project ID: 13-15111

QC Batch: T045152
QC Batch Method: EPA 3540C Soxhlet Extraction

Analysis Description: PCBs
Analysis Method: EPA 8082

Trace Project ID: T14E233
Client Project ID: 13-15111

QC Batch: T045155
QC Batch Method: % Solids

Analysis Description: Solids, Dry Weight
Analysis Method: ASTM D2974-87

SAMPLE DUPLICATE: T045155-DUP1 Original: **T14E233-09**

Parameter	Units	Original Result	DUP Result	RPD	Max RPD	Notes
% Solids	% by Wt.	82.2	81.3	1	20	

CHAIN-OF-CUSTODY RECORD

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Page 1 of 1

TRACE ID NO. T14E233

TRACE USE ONLY

Logged By: JW Checked By: JW

Received on ice: (Yes) No Preservative Checked: Yes No (N/A)

Soil Volatiles Preserved: MeOH Low Level Lab Sampling Time:

Report Results To:

Client Name: McDowell & Associates

Contact Person: Jennifer Lagerwall

Mailing Address: 2355 Heather Ave

City, State, Zip Code: Muskegon MI 49728

Phone: 231-744-2116 Fax:

Email Address: jennifer.lagerwall@mcdowellsc.com

Cell #: 231-750-4450 Sampled by: JL

Project Name & #: 13-15111

Bill To:

Billing Address (if different)

City, State, Zip Code

Attn: Phone: PO #:

Regulatory Requirements		Turnaround Requirements		Matrix Key	
MERA TMDL's	☐	Standard	☐	S = Soil	WI = Wipes
Drinking Water	☐	3-4 Day (RUSH)*	☐	W = Water	LW = Liquid Waste
NPDES	☐	24-48 Hour (RUSH)*	☑	SE = Sediment	A = Air
USACE	☐	* Requires prior approval		OI = Oil	D = Drinking Water
Special	☐			SO = Solid Waste	SL = Sludge

Request for Analytical Services

ANALYSIS REQUESTED

TRACE NO.	DATE TAKEN	TIME TAKEN	METALS FIELD FILTERED	CLIENT SAMPLE ID	MATRIX	NUMBER OF CONTAINERS	PCBs	REMARKS	Possible Health Hazard
1	5/14/14	1400		C-1	S	1	✓	Results	
2		1400		C-2			✓	5/15/14	
3				C-3			✓	by 1600	
4				C-4			✓		
5				C-5			✓		
6				C-5D			✓		
7				C-6			✓		
8				C-7			✓		
9	″	″		C-8	↓	↓	✓		

Please Sign

Item #	RELEASED BY	RECEIVED BY	DATE	TIME	Item #	RELEASED BY	RECEIVED BY	DATE	TIME
	1)		1375	15/14/14		3)		5/14/15	16:52
	2)		5-14-14	1500		4)			

In executing this Chain of Custody, the client acknowledges acceptance of the terms and conditions of the agreement as set forth at http://www.trace-labs.com/cocterms.php

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SAMPLE LOG IN CHECKLIST

Trace ID #: T14E233 Date: 5/14/14 Package Description: Coolers

Client Name: McDonnell Time: 16:52 Logged in by: JW

Cooler Receipt

Cooler/samples delivered by: Trace courier [X]
Hand delivered [ ] Name of delivery person: ____
Commercial courier [ ] UPS [ ] FED EX [ ] US Mail [ ]

Tracking Number: [X] Not Applicable
Tracking #: ____

COC Seals present and intact on cooler? No [ ] Yes [ ] [X] Not Applicable

Custody seals signed by Client? No [ ] Yes [ ] Client custody seal # (if applicable): ____

Coolant and Temperature

Type of Coolant Used

Slurry w/ crushed, cubed, or chip ice? [ ]
Multiple bags of ice around samples? [X]
Ice Packs/ Blue Ice : [ ]
No Coolant Present: [ ]

Cooler Temperature

Correction Factor: IR Thermometer 0.1 °C
Digital Stick Thermometer -0.1 °C
Temperature Blank: 6.0 °C (Use Digital Stick Thermometer)
Range of 3 samples: 9.0-10.0 °C (Use IR Thermometer)
Melt Water: Ø °C (IR or Stick Therm. - circle one)
Ice still present upon receipt: [X] Yes [ ] No

General

	Yes	No	NA	Comments
All bottles arrived unbroken with labels in good condition?	X			
Each sample point is in a sealed plastic bag?		X		
Labels filled out completely?	X			
All bottle labels agree with Chain of Custody (COC)?	X			
Sufficient sample to run tests requested?	X			
pH checked and samples at correct pH?			X	See Below*
Correct preservative added to samples?			X	
Air bubbles absent from VOAs?			X	
COC filled out properly and signed by client?	X			
COC signed in by TRACE sample custodian?	X			
Was project manager called and samples discussed?				

Notes: ____

*EMD pH Test Strips Used:
[ ] pH 0-2.5 Lot: I HC390427 [ ] pH 11.0-13.0 Lot: HC949254
[ ] Other: ____

Form 70-A.10
Effective 8/26/13

TRACE Analytical Laboratories, Inc.

CERTIFICATE OF ANALYSIS

Attachment VIII

Deed Restriction

DECLARATION OF RESTRICTIVE COVENANT

This Declaration of Restrictive Covenant ('Restrictive Covenant') was recorded with the Wayne County Register of Deeds to notify potential purchasers that a portion of the land located at 124 S. Military Street, Detroit, Michigan 48209, and legally described in the attached **Exhibit 1** (the Property) has been remediated due to the presence of PCBs (the remediated area is known as 'Area 1'). Area 1 is a vacant and unused parcel adjoining a parking lot. Use of Area 1 is limited to employees and visitors and might include occasional traversing from the parking lot to the building.

The Owner submitted a Cleanup Plan for Area 1, dated September 9, 2013, to the US Environmental Protection Agency (EPA) as notification of the planned activities, in accordance with 40 CFR 761.61(a)(3). The Cleanup Plan, was based on the "low-occupancy area" use, as defined by 40 CFR 761.3 [an area where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is...less than 335 hours (an average of 6.7 hours per week)]. The Cleanup Plan contemplated this deed restriction documenting the land use. By letter dated November 12, 2013, US EPA approved the Cleanup Plan.

In accordance with the approved Cleanup Plan on May 14, 32014, contaminated soil was excavated by EQ Industrial Services and disposed at Wayne Disposal, Inc. in Belleville, Michigan. Based on manifests provided by EQ Industrial Services, approximately 64.49 tons of soil were disposed. After cleanup, the resultant excavation was backfilled with sand. The Property is fenced to deter unintentional visitors to the Property, including Area 1.

Confirmatory sample test results indicate Area 1 has been remediated to levels well below the EPA approved cleanup objection of 25 ppm for "low-occupancy areas." Following soil removal, McDowell & Associates collected eight verification soil samples from the excavation. Seven of eight samples did not show detectable PCBs. One sample showed a detectable PCB concentration of 3 ppm.

The restrictions contained in this Restrictive Covenant are based upon information available at the time the Response Activity Report was implemented by PTDC. Future changes in the use of Area 1; the environmental condition of the Property; changes in the cleanup criteria developed under Section 21304a(2) of the NREPA; the discovery of other environmental conditions at the Property; or use of the Property in a manner inconsistent with the restrictions described below may result in this Restrictive Covenant not being protective of public health, safety, and welfare, and the environment.

Definitions

For the purposes of this Restrictive Covenant, the following definition shall apply:

"Owner" means at any given time the then-current title holder of all or any portion of the Property.

"Area 1" means a former area of PCB contaminated soil located at 124 S. Military Street in Detroit, Wayne County, Michigan.

Declaration of Land and Resource Use Restrictions

Area 1 is subject to the following restrictions:

a. Prohibited Land Uses. The Owner shall prohibit all uses of Area 1 that are not compatible with the "low-occupancy" use relied on by the Response Activity.

b. Contaminated Soil Management. The Owner shall manage all soils, media, and/or debris located on Area 1 in accordance with the applicable requirements of Part 201 Environmental Response of the Natural Resources & Environmental Protection Act (NREPA), MCL 324.20101, et seq; Part 111, Hazardous Waste Management of the NREPA, MCL 324.11101 et seq; Subtitle C of the Resource Conservation and Recovery Act, 42 USC Section 6901 *et seq.*; the administrative rules promulgated thereunder; and all other relevant state and federal laws.

Conveyance of Property Interest

A copy of this Restrictive Covenant shall be provided to all future owners, heirs, successors, lessees, easement holders, assigns, and transferees of Area 1 by the person transferring the interest in accordance with Section 20116(3) of NREPA.

Term of Restrictive Covenant

This Restrictive Covenant shall run with the land and is binding on the Owner; future owners; and their successors and assigns, lessees, easement holders, and any authorized agents, employees, or persons acting under their direction and control. This Restrictive Covenant shall continue in effect until 30 days after achieving the cleanup levels specified in 40 CFR 761.

IN WITNESS WHEREOF, _____ has caused this Restrictive Covenant, _____, to be executed on this _____.

PTDC Properties, LLC

By: _____

Name: David J. Carter

Title: Shareholder

STATE OF MI

COUNTY OF Wayne

BARBARA D MCSWAIN
Notary Public - Michigan
Wayne County
My Commission Expires May 16, 2017
Acting in the County of Wayne

_____
Notary Public Signature

Notary Public, State of Michigan

County of Wayne

My commission expires: 5-16-2017

Acting in the County of Wayne

Drafted by: _____

Name: _____

Company: _____

Address: _____

EXHIBIT 1

LEGAL DESCRIPTION OF PROPERTY

AND AREA 1

General Property Information

City of Detroit

[Back to Non-Printer Friendly Version] [Send To Printer]

Parcel: 16016505-6 **Unit:** CITY OF DETROIT

Flag: SEE ASSESSORS COMMENTS FOR CORRECT REN ZONE INFO

Property Address [collapse]

124 S MILITARY
DETROITMI48209

Owner Information [collapse]

PTDC PROPERTIES LLC
124 S MILITARY
DETROIT, MI 48209

Unit: 01

Taxpayer Information [collapse]

SEE OWNER INFORMATION

General Information for Tax Year 2014 [collapse]

Property Class:	301 - 301-INDUSTRIAL	**Assessed Value:**	$59,046
School District:	D - DETROIT SCHOOLS	**Taxable Value:**	$59,046
State Equalized Value:	$59,046	**Map #**	16
DISTRICT	5	**Date of Last Name Chg:**	10/10/2012
		Date Filed:	
		Notes:	N/A
Historical District:	N/A	**Census Block Group:**	N/A

Principal Residence Exemption	**June 1st**	**Final**
		-
2013	0.0000 %	0.0000 %

Previous Year Info	MBOR Assessed	Final S.E.V.	Final Taxable
2013	$59,046	$59,046	$58,684
2012	$0	$0	$0
2011	$0	$0	$0

Land Information [collapse]

	Frontage		Depth
Lot 1:	0.00 Ft.		0.00 Ft.
Lot 2:	0.00 Ft.		0.00 Ft.
Lot 3:	0.00 Ft.		0.00 Ft.
Total Frontage:	0.00 Ft.	**Average Depth:**	0.00 Ft.

Total Acreage:	0.38		
Zoning Code:			
Total Estimated Land Value:	$18,447	**Mortgage Code:**	
Land Improvements:	$10,005	**Lot Dimensions/Comments:**	N/A
Renaissance Zone:	239 (Complies With Zone)		

Renaissance Zone Expiration Date:

Legal Information for 16016505-6 [collapse]

W MILITARY S 70 FT 128 AND 127, N 68 FT E 315 FT AND S 30 FT W 138.50 FT 72 ALSO 1/2 OF VACATED ALLEY DANIEL SCOTTEN SUB L9 P19 PLATS, W C R 16/8 (16,848 SQ FT)

Land Divison Act Information [collapse]

Date of Last Split/Combine:	10/10/2012	**Number of Splits Left:**	0
Date Form Filed:		**Unallocated Div.s of Parent:**	0
Date Created:	10/10/2012	**Unallocated Div.s Transferred:**	0
Acreage of Parent:	0.00	**Rights Were Transferred?**	NO
Split Number:	0	**Courtesy Split?**	NO
		Parent Parcel:	

Sales Information

1 sale record(s) found.

Sale Date	Sale Price	Instrument	Grantor	Grantee	Terms Of Sale	Liber/Page
11/14/2011	$1,150,000.00	PTA	NEWMAN, PHYLLIS	PTDC PROPERTIES, LLC	MULTIPLE ECF	

Note

MULTIPLE SALE-SEE COMMENTS

Building Information

2 building(s) found.

Description	Floor Area	Yr Built
Commercial/Industrial Building 1 - *Office Building*	1197 Sq. Ft.	1978

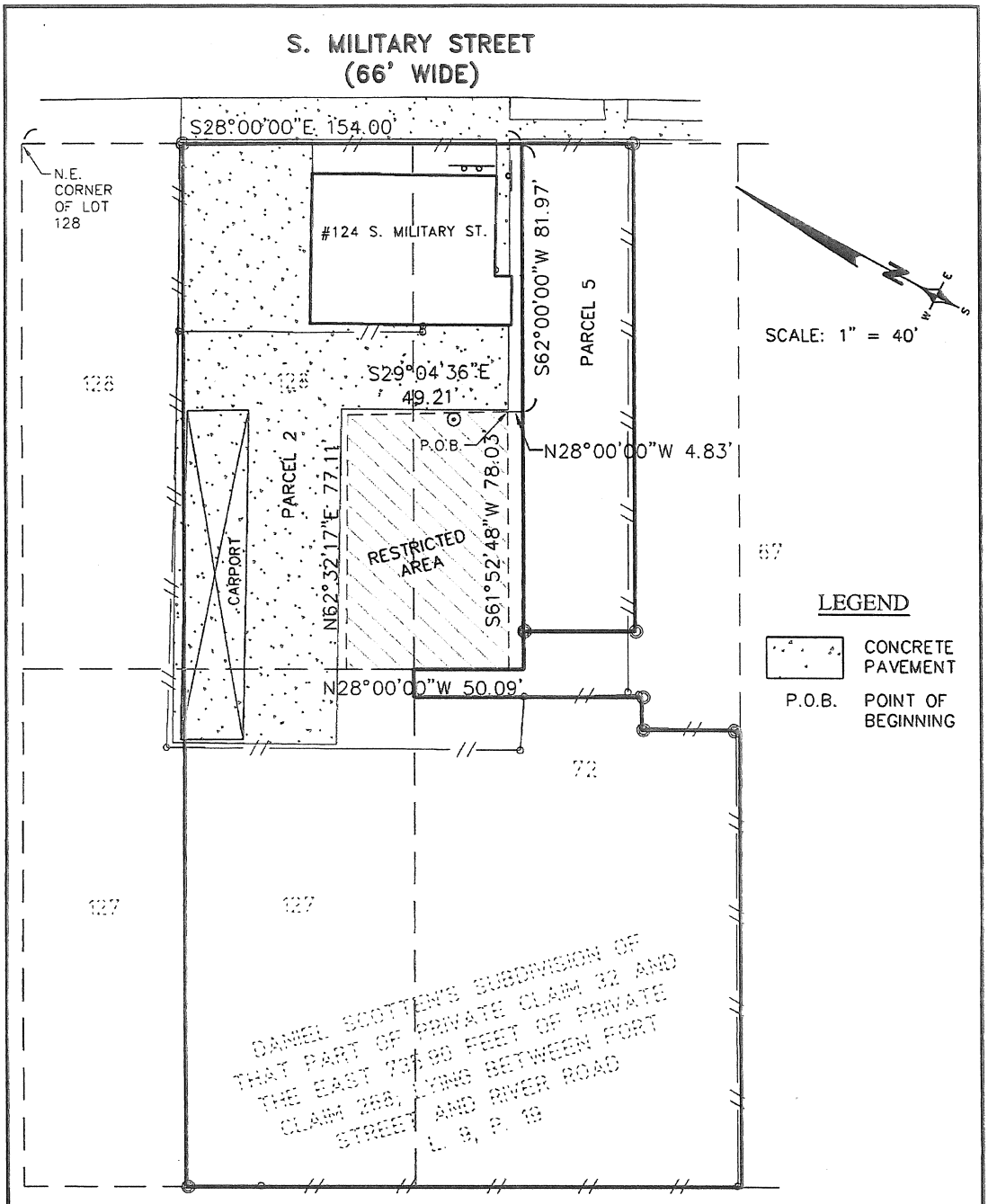
General Information

Floor Area:	1197 Sq. Ft.	**Estimated TCV:**	N/A
Occupancy:	Office Building	**Class:**	C
Stories Above Ground:	1	**Average Story Height:**	13
Basement Wall Height:	N/A		
Year Built:	1978	**Year Remodeled:**	0
Percent Complete:	100%	**Heat:**	Complete H.V.A.C
Physical Percent Good:	46%	**Functional Percent Good:**	100%
Economic Percent Good:	100%	**Effective Age:**	34 yrs.

Commercial/Industrial Building 2 - *Office Building*	1503 Sq. Ft.	1988

General Information

Floor Area:	1503 Sq. Ft.	**Estimated TCV:**	N/A
Occupancy:	Office Building	**Class:**	C
Stories Above Ground:	1	**Average Story Height:**	13
Basement Wall Height:	N/A		
Year Built:	1988	**Year Remodeled:**	0
Percent Complete:	100%	**Heat:**	Package Heating & Cooling
Physical Percent Good:	62%	**Functional Percent Good:**	100%
Economic Percent Good:	100%	**Effective Age:**	24 yrs.



LEGAL DESCRIPTION OF A RESTRICTED AREA

AN AREA LOCATED IN THE CITY OF DETROIT, WAYNE COUNTY MICHIGAN, BEING MORE PARTICULARLY DESCRIBED AS:

COMMENCING AT THE N.E. CORNER OF LOT 128 OF DANIEL SCOTTEN'S SUBDIVISION OF THAT PART OF PRIVATE CLAIM 32 AND EAST 735.90 FEET OF PRIVATE CLAIM 268; LYING BETWEEN FORT STREET AND RIVER ROAD AS RECORDED IN LIBER 9 OF PLATS, PAGE 19, WAYNE COUNTY RECORDS; THENCE S. 28°00'00" E. 154.00 FEET ALONG THE WEST RIGHT OF WAY LINE OF SOUTH MILITARY STREET (66 FEET WIDE); THENCE S. 62°00'00" W. 81.97 FEET; THENCE N. 28°00'00" W. 4.83 FEET TO THE POINT OF BEGINNING OF SAID RESTRICTED AREA; THENCE S. 61°52'48" W. 78.03 FEET; THENCE N. 28°00'00" W. 50.09 FEET; THENCE N. 62°32'17" E. 77.11 FEET; THENCE S. 29°04'36" E. 49.21 FEET TO THE POINT OF BEGINNING, CONTAINING 3,851 SQUARE FEET.

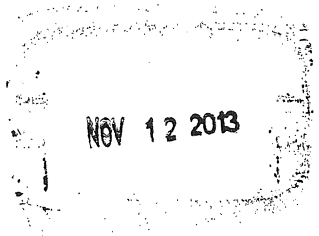
REVISIONS		
ITEM	DATE	BY

RESTRICTED AREA
PEERLESS METAL
DETROIT MICHIGAN

ZEIMET WOZNIAK & ASSOCIATES
Civil Engineers & Land Surveyors
55800 GRAND RIVER AVE, SUITE 100
NEW HUDSON, MICHIGAN 48165
P: (248) 437-5099 F: (248) 437-5222 www.zeimetwozniak.com

DATE	SCALE HOR: 1" = 40'
12-17-14	FIELD BOOK NO. 537
DESIGNED BY RH	JOB NO. 14159
DRAWN BY PTG	SHEET NO. 1/1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

LU-9J

Via Certified Mail (7009 1680 0000 7671 3603)
Return Receipt Requested

Ms. Jennifer Lagerbohm
McDowell & Associates
21355 Hatcher Avenue
Ferndale, Michigan 48220

RE: Self-Implementing Polychlorinated Biphenyls (PCB) Cleanup:
Peerless Metal Powders
124 S. Military Street
Detroit, Michigan

Dear Ms. Lagerbohm,

We have completed our review of the September 9, 2013, notification and certification that you intend to conduct a self-implementing cleanup and disposal of PCB remediation waste in accordance with the requirements of 40 CFR 761.61(a). We received this notification on October 17, 2013. Based on our review, your notification is hereby approved, subject to the following conditions:

1. As stated in 40 CFR 761.61(a), you must conduct the cleanup in accordance with all applicable requirements of 40 CFR 761.61(a)(1) through (9). For your reference, the applicable regulations may be found at http://www.ecfr.gov. To assist you in completing the cleanup successfully, we have placed an "X" in the margin to identify specific requirements for which your notice is deficient in describing how you plan to comply. Specific comments about each of the deficient areas are noted in bold italics following the regulatory citation.

2. You must prepare a cleanup completion summary report that describes how you conducted the cleanup in accordance with the applicable regulatory requirements, including those marked with an "X" on the enclosure. You must send a copy to me within six months after the date of this letter.

3. If your cleanup activity includes the use of a fence or a cap that must be maintained in perpetuity, or if any portion of the site is cleaned up to the levels appropriate for low

occupancy areas, then you must notify us thirty days prior to any change in ownership of the property. Such notice must include the name, address and telephone number of the new owner, and the name of the new owner's contact person for this matter. You must also submit a letter, signed by the potential purchaser, stating whether it intends to maintain the fence or cap, and whether it plans to maintain the low occupancy land use, or whether it intends to remove and dispose of additional PCB-contaminated soils off-site instead.

Please note that this approval does not relieve you from your duty to comply with all other applicable federal, state, and local requirements. In addition, please note that if you wish to make any changes to your notification (including changes in the project schedule), then you must submit your proposal to Ms. Tamara Ohl, of my staff, in writing at least 14 calendar days prior to the proposed implementation of the change. If you have any questions, please contact her by e-mail at ohl.tamara@epa.gov or by telephone at (312) 886-0991.

Sincerely,

Jose G. Cisneros, Chief
Remediation and Reuse Branch

cc: Michigan Department of Environmental Quality
Wayne County Health Department

ENCLOSURE

Regulatory Requirements of 40 CFR 761.61(a)

Please note that an "X" in the margin [ ] indicates that the notification and certification of your intention to conduct a self-implementing cleanup does not adequately explain how you intend to comply with the regulatory requirement.

[ ] (1) *Applicability*

(i) The self-implementing procedures may not be used to clean up:

(A) Surface or ground waters.

(B) Sediments in marine and freshwater ecosystems.

(C) Sewers or sewage treatment systems.

(D) Any private or public drinking water sources or distribution systems.

(E) Grazing lands.

(F) Vegetable gardens.

[ ] (ii) The self-implementing cleanup provisions shall not be binding upon cleanups conducted under other authorities, including but not limited to, actions conducted under section 104 or section 106 of CERCLA, or section 3004(u) and (v) or section 3008(h) of RCRA.

[ ] (2) ***Site characterization***. Any person conducting self-implementing cleanup of PCB remediation waste must characterize the site adequately to be able to provide the information required by paragraph (a)(3) of this section. Subpart N of this part provides a method for collecting new site characterization data or for assessing the sufficiency of existing site characterization data.

[ ] (3) ***Notification and certification***.

[ ] (i) At least 30 days prior to the date that the cleanup of a site begins, the person in charge of the cleanup or the owner of the property where the PCB remediation waste is located shall notify, in writing, the EPA Regional Administrator, the Director of the State or Tribal environmental protection agency, and the Director of the county or local environmental protection agency where the cleanup will be conducted. The notice shall include:

[ ] (A) The nature of the contamination, including kinds of materials contaminated.

[ ] (B) A summary of the procedures used to sample contaminated and adjacent areas and a table or cleanup site map showing PCB concentrations measured in all pre-cleanup characterization samples. The summary must include sample collection and analysis dates. The EPA Regional Administrator may require more detailed information including, but not limited to, additional characterization sampling or all sample identification numbers from all previous characterization activities at the cleanup site.

[X] (C) The location and extent of the identified contaminated area, including topographic maps with sample collection sites cross referenced to the sample identification numbers in the data summary from paragraph (a)(3)(i)(B) of this section.

A topographic map was not included in the plan. Please include this map in the cleanup report.

[X] (D) A cleanup plan for the site, including schedule, disposal technology, and approach. This plan should contain options and contingencies to be used if unanticipated higher concentrations or wider distributions of PCB remediation waste are found or other obstacles force changes in the cleanup approach.

A schedule for completion of cleanup was not included in the plan, therefore, provide a copy of the cleanup report to EPA within six months after the date of this letter.

[ ] (E) A written certification, signed by the owner of the property where the cleanup site is located and the party conducting the cleanup, that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file at the location designated in the certificate, and are available for EPA inspection. Persons using alternate methods for chemical extraction and chemical analysis for site characterization must include in the certificate a statement that such a method will be used and that a comparison study which meets or exceeds the requirements of subpart Q of this part, and for which records are on file, has been completed prior to verification sampling.

[ ] (ii) Within 30 calendar days of receiving the notification, the EPA Regional Administrator will respond in writing approving of the self-implementing cleanup, disapproving of the self-implementing cleanup, or requiring additional information. If the EPA Regional Administrator does not respond within 30 calendar days of receiving the notice, the person submitting the notification may assume that it is complete and acceptable and proceed with the cleanup according to the information the person provided to the EPA Regional Administrator. Once cleanup is underway, the person conducting the cleanup must provide any proposed changes from the notification to the EPA Regional Administrator in writing no less than 14 calendar days prior to the proposed implementation of the change. The EPA Regional Administrator will determine in his or her discretion whether to accept the change, and will respond to the change notification verbally within 7 calendar days and in writing within 14 calendar days of receiving it. If the EPA Regional Administrator does not respond verbally within 7 calendar days and in writing within 14 calendar days of receiving the change notice, the person who submitted it may deem it complete and acceptable and proceed with the cleanup according to the information in the change notice provided to the EPA Regional Administrator.

[ ] (iii) Any person conducting a cleanup activity may obtain a waiver of the 30-day notification requirement, if they receive a separate waiver, in writing, from each of the agencies they are required to notify under this section. The person must retain the original written waiver as required in paragraph (a)(9) of this section.

[ ] (4) ***Cleanup levels***. For purposes of cleaning, decontaminating, or removing PCB remediation waste under this section, there are four general waste categories: bulk PCB remediation waste, non-porous surfaces, porous surfaces, and liquids. Cleanup levels are based on the kind of material and the potential exposure to PCBs left after cleanup is completed.

[ ] (i) *Bulk PCB remediation waste*. Bulk PCB remediation waste includes, but is not limited to, the following non-liquid PCB remediation waste: soil, sediments, dredged materials, muds, PCB sewage sludge, and industrial sludge.

[ ] (A) *High occupancy areas*. The cleanup level for bulk PCB remediation waste in high occupancy areas is ≤1 ppm without further conditions. High occupancy areas where bulk PCB remediation waste remains at concentrations >1 ppm and ≤10 ppm shall be covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section.

[ ] (B) *Low occupancy areas*.

[ ] (1) The cleanup level for bulk PCB remediation waste in low occupancy areas is ≤25 ppm unless otherwise specified in this paragraph.

[ ] (2) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤50 ppm if the site is secured by a fence and marked with a sign including the M_L mark.

[ ] (3) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤100 ppm if the site is covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section.

[ ] (ii) *Non-porous surfaces*. In high occupancy areas, the surface PCB cleanup standard is ≤ 10 μg/100 cm^2 of surface area. In low occupancy areas, the surface cleanup standard is <100 μg/100 cm^2 of surface area. Select sampling locations in accordance with subpart P of this part or a sampling plan approved under paragraph (c) of this section.

[ ] (iii) *Porous surfaces.* In both high and low occupancy areas, any person disposing of porous surfaces must do so based on the levels in paragraph (a)(4)(i) of this section. Porous surfaces may be cleaned up for use in accordance with §761.79(b)(4) or §761.30(p).

[ ] (iv) *Liquids*. In both high and low occupancy areas, cleanup levels are the concentrations specified in §761.79(b)(1) and (b)(2).

[ ] (v) *Change in the land use for a cleanup site*. Where there is an actual or proposed change in use of an area cleaned up to the levels of a low occupancy area, and the exposure of people or animal life in or at that area could reasonably be expected to increase, resulting in a change in status from a low occupancy area to a high occupancy area, the owner of the area shall clean up the area in accordance with the high occupancy area cleanup levels in paragraphs (a)(4)(i) through (a)(4)(iv) of this section.

[ ] (vi) The EPA Regional Administrator, as part of his or her response to a notification submitted in accordance with §761.61(a)(3) of this part, may require cleanup of the site, or portions of it, to more stringent cleanup levels than are otherwise required in this section, based on the proximity to areas such as residential dwellings, hospitals, schools, nursing homes, playgrounds, parks, day care centers, endangered species habitats, estuaries, wetlands, national parks, national wildlife refuges, commercial fisheries, and sport fisheries.

[X] (5) ***Site cleanup.*** In addition to the options set out in this paragraph, PCB disposal technologies approved under §§761.60 and 761.70 are acceptable for on-site self-implementing PCB remediation waste disposal within the confines of the operating conditions of the respective approvals.

The plan references disposal at EQ as hazardous waste. Ensure the cleanup report includes a reference to the specific facility used for disposal.

[ ] (i) *Bulk PCB remediation waste.* Any person cleaning up bulk PCB remediation waste shall do so to the levels in paragraph (a)(4)(i) of this section.

[ ] (A) Any person cleaning up bulk PCB remediation waste on-site using a soil washing process may do so without EPA approval, subject to all of the following:

(1) A non-chlorinated solvent is used.
(2) The process occurs at ambient temperature.
(3) The process is not exothermic.
(4) The process uses no external heat.
(5) The process has secondary containment to prevent any solvent from being released to the underlying or surrounding soils or surface waters.
(6) Solvent disposal, recovery, and/or reuse is in accordance with relevant provisions of approvals issued according to paragraphs (b)(1) or (c) of this section or applicable paragraphs of §761.79.

[ ] (B) Bulk PCB remediation waste may be sent off-site for decontamination or disposal in accordance with this paragraph, provided the waste is either dewatered on-site or transported off-site in containers meeting the requirements of the DOT Hazardous Materials Regulations (HMR) at 49 CFR parts 171 through 180.

[ ] (1) Removed water shall be disposed of according to paragraph (b)(1) of this section.

[ ] (2) Any person disposing off-site of dewatered bulk PCB remediation waste shall do so as follows:

(i) Unless sampled and analyzed for disposal according to the procedures set out in §§761.283, 761.286, and 761.292, the bulk PCB remediation waste shall be assumed to contain ≥50 ppm PCBs.
(ii) Bulk PCB remediation wastes with a PCB concentration of <50 ppm shall be disposed of in accordance with paragraph (a)(5)(v)(A) of this section.
(iii) Bulk PCB remediation wastes with a PCB concentration ≥50 ppm shall be disposed of in a hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA, or a PCB disposal facility approved under this part.
(iv) The generator must provide written notice, including the quantity to be shipped and highest concentration of PCBs (using extraction EPA Method 3500B/3540C or Method 3500B/3550B followed by chemical analysis using EPA Method 8082 in SW-846 or methods validated under subpart Q of this part) at least 15 days before the first shipment of bulk PCB remediation waste from each cleanup site by the generator, to each off-site facility where the waste is destined for an area not subject to a TSCA PCB Disposal Approval.

[ ] (3) Any person may decontaminate bulk PCB remediation waste in accordance with §761.79 and return the waste to the cleanup site for disposal as long as the cleanup standards of paragraph (a)(4) of this section are met.

[ ] (ii) Non-porous surfaces. PCB remediation waste non-porous surfaces shall be cleaned on-site or off-site for disposal on-site, disposal off-site, or use, as follows:

[ ] (A) For on-site disposal, non-porous surfaces shall be cleaned on-site or off-site to the levels in paragraph (a)(4)(ii) of this section using:
(1) Procedures approved under §761.79.
(2) Technologies approved under §761.60(e).
(3) Procedures or technologies approved under paragraph (c) of this section.

[ ] (B) For off-site disposal, non-porous surfaces:
(1) Having surface concentrations <100 μg/100 cm^2 shall be disposed of in accordance with paragraph (a)(5)(i)(B)(2)(ii) of this section. Metal surfaces may be thermally decontaminated in accordance with §761.79(c)(6)(i).
(2) Having surface concentrations ≥100 μg/100 cm^2 shall be disposed of in accordance with paragraph (a)(5)(i)(B)(2)(iii) of this section. Metal surfaces may be thermally decontaminated in accordance with §761.79(c)(6)(ii).

[ ] (C) For use, non-porous surfaces shall be decontaminated on-site or off-site to the standards specified in §761.79(b)(3) or in accordance with §761.79(c).

[ ] (iii) *Porous surfaces.* Porous surfaces shall be disposed on-site or off-site as bulk PCB remediation waste according to paragraph (a)(5)(i) of this section or decontaminated for use according to §761.79(b)(4), as applicable.

[ ] (iv) *Liquids.* Any person disposing of liquid PCB remediation waste shall either:

(A) Decontaminate the waste to the levels specified in §761.79(b)(1) or (b)(2).
(B) Dispose of the waste in accordance with paragraph (b) of this section or an approval issued under paragraph (c) of this section.

[ ] (v) *Cleanup wastes.* Any person generating the following wastes during and from the cleanup of PCB remediation waste shall dispose of or reuse them using one of the following methods:

[ ] (A) Non-liquid cleaning materials and personal protective equipment waste at any concentration, including non-porous surfaces and other non-liquid materials such as rags, gloves, booties, other disposable personal protective equipment, and similar materials resulting from cleanup activities shall be either decontaminated in accordance with §761.79(b) or (c), or disposed of in one of the following facilities, without regard to the requirements of subparts J and K of this part:
(1) A facility permitted, licensed, or registered by a State to manage municipal solid waste subject to part 258 of this chapter.
(2) A facility permitted, licensed, or registered by a State to manage non-municipal non-hazardous waste subject to §§257.5 through 257.30 of this chapter, as applicable.

(3) A hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA.
(4) A PCB disposal facility approved under this part.

[ ] (B) Cleaning solvents, abrasives, and equipment may be reused after decontamination in accordance with §761.79.

[ ] (6) *Cleanup verification* —

[X] (i) *Sampling and analysis*. Any person collecting and analyzing samples to verify the cleanup and on-site disposal of bulk PCB remediation wastes and porous surfaces must do so in accordance with subpart O of this part. Any person collecting and analyzing samples from non-porous surfaces must do so in accordance with subpart P of this part. Any person collecting and analyzing samples from liquids must do so in accordance with §761.269. Any person conducting interim sampling during PCB remediation waste cleanup to determine when to sample to verify that cleanup is complete, may use PCB field screening tests.

The Plan references completing verification sampling in accordance with subpart O, however does not describe the sampling. Ensure that verification sampling is completed in accordance with this subpart and documented in the report.

[ ] (ii) *Verification.*
(A) Where sample analysis results in a measurement of PCBs less than or equal to the levels specified in paragraph (a)(4) of this section, self-implementing cleanup is complete.
(B) Where sample analysis results in a measurement of PCBs greater than the levels specified in paragraph (a)(4) of this section, self-implementing cleanup of the sampled PCB remediation waste is not complete. The owner or operator of the site must either dispose of the sampled PCB remediation waste, or reclean the waste represented by the sample and reinitiate sampling and analysis in accordance with paragraph (a)(6)(i) of this section.

[ ] (7) ***Cap requirements.*** A cap means, when referring to on-site cleanup and disposal of PCB remediation waste, a uniform placement of concrete, asphalt, or similar material of minimum thickness spread over the area where remediation waste was removed or left in place in order to prevent or minimize human exposure, infiltration of water, and erosion. Any person designing and constructing a cap must do so in accordance with §264.310(a) of this chapter, and ensure that it complies with the permeability, sieve, liquid limit, and plasticity index parameters in §761.75(b)(1)(ii) through (b)(1)(v). A cap of compacted soil shall have a minimum thickness of 25 cm (10 inches). A concrete or asphalt cap shall have a minimum thickness of 15 cm (6inches). A cap must be of sufficient strength to maintain its effectiveness and integrity during the use of the cap surface which is exposed to the environment. A cap shall not be contaminated at a level ≥1 ppm PCB per Aroclor (or equivalent) or per congener. Repairs shall begin within 72 hours of discovery for any breaches which would impair the integrity of the cap.

[ ] (8) *Deed restrictions for caps, fences and low occupancy areas*. When a cleanup activity conducted under this section includes the use of a fence or a cap, the owner of the site must maintain the fence or cap, in perpetuity. In addition, whenever a cap, or the procedures and requirements for a low occupancy area, is used, the owner of the site must meet the following conditions:

[ ] (i) Within 60 days of completion of a cleanup activity under this section, the owner of the property shall:

[ ] (A) Record, in accordance with State law, a notation on the deed to the property, or on some other instrument which is normally examined during a title search, that will in perpetuity notify any potential purchaser of the property:

(1) That the land has been used for PCB remediation waste disposal and is restricted to use as a low occupancy area as defined in §761.3.

(2) Of the existence of the fence or cap and the requirement to maintain the fence or cap.

(3) The applicable cleanup levels left at the site, inside the fence, and/or under the cap.

[ ] (B) Submit a certification, signed by the owner, that he/she has recorded the notation specified in paragraph (a)(8)(i)(A) of this section to the EPA Regional Administrator.

[ ] (ii) The owner of a site being cleaned up under this section may remove a fence or cap after conducting additional cleanup activities and achieving cleanup levels, specified in paragraph (a)(4) of this section, which do not require a cap or fence. The owner may remove the notice on the deed no earlier than 30 days after achieving the cleanup levels specified in this section which do not require a fence or cap.

[ ] (9) ***Recordkeeping***. For paragraphs (a)(3), (a)(4), and (a)(5) of this section, recordkeeping is required in accordance with §761.125(c)(5).

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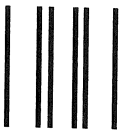

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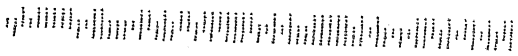
Tamara Ohl
US EPA Region 5
77 West Jackson Blvd
Mailcode LU-9J
Chicago, IL 60604



SENDER: ***COMPLETE THIS SECTION***

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mail or on the front if space permits.

1. Article Addressed to:

Ms. Jennifer Lagerbohm
McDowell & Associates
21355 Hatcher Avenue
Ferndale, MI 48220

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* JONATHAN BROWN

B. Date of Delivery

ature

☐ Agent
☐ Addressee

v address different from item 1? ☐ Yes
ter delivery address below: ☐ No

3. Service Type
☐ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☑ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
(Transfer from service label) 7009 1680 0000 7671 3603

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

7009 1680 0000 7671 3603

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(Domestic Mail Only; No Insurance Coverage Provided)

LU-95
Ohl

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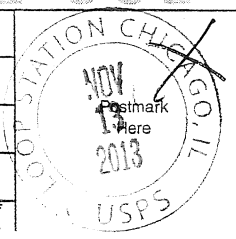

Postmark Here

Ms. Jennifer Lagerbohm
McDowell & Associates
21355 Hatcher Avenue
Ferndale, MI 48220

LAND AND CHEMICALS DIVISION

Type of Document: Self-Implementing 40 CFR 761.61(a)

Name of Document: Peerless Metal Powders

	NAMES	DATE
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COMMENTS:

Mailed out on 11/13/13 by Angela Jackson

CLEANUP PLAN FOR SELF-IMPLEMENTING ON-SITE CLEANUP AND DISPOSAL OF PCB REMEDIATION WASTE PEERLESS METAL POWDERS & AREA OF PROPERTY WITH ELEVATED PCB ABRASIVES 124 S. MILITARY STREET DETROIT, WAYNE COUNTY, MICHIGAN

U. S. ENVIRONMENTAL PROTECTION AGENCY (US EPA)
77 W. JACKSON BOULEVARD
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MAIL CODE LU-9J

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SEPTEMBER 9, 2013

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September 9, 2013

U.S. Environmental Protection Agency (US EPA)
77 W. Jackson Boulevard
Chicago, Illinois 60604
Mail Code LU-9J

Job No. 13-15111

Attention: Regional Administrator

Subject: Cleanup Plan for Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste
Peerless Metal Powders & Area of Property with Elevated PCB Abrasives
124 S. Military Street
Detroit, Wayne County, Michigan

Pursuant to the request of Peerless Metal Powders & Abrasives, McDowell & Associates has completed this Cleanup Plan for Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste (Cleanup Plan) for the subject property.

This Cleanup Plan is being submitted to the US EPA as notification of the planned activities, in accordance with 40 CFR 761.61(a)(3). Copies of the Cleanup Plan are also being submitted to the Michigan Department of Environmental Quality (MDEQ) and the Wayne County Health Department.

The area of the subject property with elevated PCBs is located in an exterior area near a parking lot on the office portion of the subject property. The area is vacant and unused. Use of this area by employees and visitors might include occasional traversing from the parking lot to the building, and would be considered a "low occupancy area" as defined in 40 CFR Part 761- an area where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is...less than 335 hours (an average of 6.7 hours per week). In addition, the property is fenced to deter unintentional visitors to the property.

Background

The subject property is located at 124 W. Military Street in Detroit, Wayne County, Michigan. A Site Location Map, which shows the approximate location of the subject property, accompanies this letter as Attachment I. A legal description of the subject property accompanies this letter as Attachment II. Peerless Metal Powders & Abrasives purchased the property under land contract in November 2011.

McDowell & Associates was provided a copy of a Historical Review and Limited Phase II Site Investigation Report, completed by AKT Peerless Environmental & Energy Services (AKT) on August 26, 2011 and a Supplemental Phase II Environmental Site Assessment (ESA) by AKT dated November 11, 2011.

Based on Sanborn Fire Insurance Maps included in the Historic Review, the subject property was occupied by a coal yard (1910), lumber yard (1923), and junk yard (1950-1978). Rail spurs were located to the north and residences were located to the south. A former gasoline UST was reportedly located northeast of the PCB-remediation area, and was closed in place in 1988.

As part of the Limited Phase II Site Investigation, AKT made three soil borings on the property, two on the west adjacent parcel (AKT-2 and AKT-3) and one on the subject property (AKT-1). Subsurface conditions reported by AKT at AKT-1 consisted of gravel with vegetation underlain by silty sandy fill soil containing trace amounts of brick debris and glass to a depth of 9' below ground surface (bgs), and followed by gray clay. No groundwater was reported in the boring, which was made to a depth of 12' bgs.

One soil sample was collected from AKT-1 at a depth of 8' - 9' bgs and submitted for chemical testing to determine the presence of volatile organic compounds (VOCs), Base/Neutral/Acid semi-volatile organic compounds (BNA SVOCs), polychlorinated biphenyls (PCBs), and the following metals: antimony, arsenic, barium, beryllium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, thallium, and zinc.

Results of chemical testing showed PCBs were detected in AKT-1 (8' - 9') at a concentration of 8.5 mg/kg (parts per million, ppm).

As part of AKT's Supplemental Phase II ESA, additional investigation was conducted to define the vertical and horizontal extent of PCB soil contamination in the vicinity of AKT-1. On September 19, 2011, AKT attempted to advance 20 borings in a 20' radium of AKT-1; however, concrete refusal was noted at 1.5' to 2' bgs. AKT was able to make one boring (AKT-4) approximately 20' south of AKT-1. Two soil samples were collected from AKT-4 at depths of 2' - 2.5' and 8.5' - 9' bgs.

Based on the presence of the concrete slab encountered, AKT conducted a test pit to the north, east, south, and west of AKT-1 to further delineate the PCB contamination. Eleven additional soil samples were collected and submitted for chemical testing to determine the presence of PCBs.

Summary of Sampling and Extent of Contamination

Sampling and testing was conducted by AKT Peerless in 2011. McDowell & Associates has not completed independent sampling and testing at the subject property. Soil samples were reportedly placed in laboratory-supplied jars in accordance with the US EPA Publication SW-846, Testing Methods of Evaluating Solid Waste. Samples were analyzed using EPA Method 8082.

Summarized below are soil sampling and PCB concentrations as provided in AKT's reports for the subject property.

Sample ID	Date	PCB Concentration (ppm)	Sample ID	Date	PCB Concentration (ppm)
AKT-1 (8-9)	8/2/2011	8.5	TP-3 (8-9)	9/28/2011	<0.33
AKT-1 (10-10.5)	9/28/2011	<0.33	TP-4 (2-3)	9/28/2011	7.7
AKT-4 (2-2.5)	9/19/2011	<0.33	TP-4 (8-9)	9/28/2011	65
AKT-4 (8.5-9)	9/19/2011	1.2	TP-5 (2-3)	9/28/2011	<0.33
TP-2 (2-3)	9/28/2011	1.1	TP-5 (8-9)	9/28/2011	<0.33
TP-2 (8-9)	9/28/2011	<0.33	TP-7 (2-3)	9/28/2011	<0.33
TP-3 (2-3)	9/28/2011	2.4	TP-7 (8-9)	9/28/2011	<0.33

Chemical test results, Sample Location Map, and summary tables are also attached for reference.

Cleanup Plan

The Cleanup Plan proposed for the area with PCB-contaminated soil was prepared in accordance with 40 CFR 761 and includes excavation and off-site disposal. The Cleanup Plan has been separated into two tasks:

1) Remove the soil with PCBs at concentrations exceeding 25 ppm (the cleanup level for bulk PCB remediation waste in low occupancy areas) for disposal at EQ as hazardous waste. Based on information provided by AKT, it was estimated that the area exceeding 50 ppm (at TP-4 –[8' - 9']) was approximately 10' by 10' and 10' deep.

   Following removal of that soil, McDowell & Associates will collect verification soil samples in accordance with 40 CFR 761 Subpart 0. Soil samples will be submitted to an accredited laboratory for testing to determine the presence of PCBs. If any of the verification soil samples exceed 50 ppm, additional soil will be removed for disposal at EQ and the process repeated until results are below 50 ppm.

2) Following removal as described above, a deed restriction will be placed on the property documenting the area of the subject property as a "low occupancy area".

Upon completion of remedial activities, a written summary report would be completed in accordance with 40 CFR 761.61 that documents cleanup activities, confirmatory sample test results, and disposal of soil.

If unusual conditions are encountered during cleanup that prohibit remediation of the soil to demonstrate cleanup to levels below 25 ppm, then the Cleanup Plan may be altered to include one or more of the following alternatives: 1) additional soil removal and off-site disposal, 2) capping with pavement, 3) restricting access.

The Owner's Certification information is presented below.

If you have any questions regarding the information contained in this report, or if we can be of further service, please do not hesitate to call.

Very truly yours,

McDOWELL & ASSOCIATES

Jennifer Lagerbohm, M.S., CHMM
Senior Industrial Hygienist

Douglas M. McDowell, M.S., P.E.
Environmental Manager

JL/nm/def

Owner's Certification

In accordance with 40 CFR 761.61(a)(3)(E), Peerless Metal Powders & Abrasives (current owner of the property and party conducting the cleanup) certifies that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site was documented by AKT Peerless, and are on-file at Peerless Metal Powders & Abrasives, and are available for US EPA inspection.

Peerless Metal Powders & Abrasives
124 S. Military Street
Detroit, Michigan 48209

Paul W Towley Mgr/Prod 10/10/13

Attachments

Table 1: - Summary of Reported PCBs Chemistry Results (Soil)

Attachment I - Site Location Map
Attachment II - Site Sketch
Attachment III - Sample Location Map
Attachment IV - Log of Soil Boring Sheets
Attachment V - Chemical Test Results

Table 1:

Summary of Reported PCBs Chemistry Results (Soil)

McDowell Job No. 13-15111

JL 9/20/2013

TABLE 1- SUMMARY OF REPORTED POLYCHLORINATED BIPHENYLS (PCBS) CHEMISTRY RESULTS (Soil)

Sample	Date	Depth	PCBs (Total) 1336363
AKT-1	8/2/2001	8'- 9'	8.5
AKT-1	9/28/2001	10'- 10.5'	<0.33
AKT-4	9/19/2001	2'- 2.5'	<0.33
AKT-4	9/28/2001	8.5'- 9'	1.2
TP-2	9/28/2001	2'- 3'	1.1
TP-2	9/28/2001	8'- 9'	<0.33
TP-3	9/28/2001	2'- 3'	2.4
TP-3	9/28/2001	8'- 9'	<0.33
TP-4	9/28/2001	2'- 3'	7.7
TP-4	9/28/2001	8'- 9'	65
TP-5	9/28/2001	2'- 3'	<0.33
TP-5	9/28/2001	8'- 9'	<0.33
TP-7	9/28/2001	2'- 3'	<0.33
TP-7	9/28/2001	8'- 9'	<0.33
MDEQ Generic Residential Direct Contact Criteria			**4**
MDEQ Generic Non-Residential Direct Contact Criteria			**16**
TSCA Subpart D Cleanup Standards Residential and Non-Residential- not capped			**1**
TSCA Subpart D Cleanup Standards High-Occupancy Areas-capped*			**10**
TSCA Subpart D Cleanup Standards Low-Occupancy Areas- capped*			**100**
TSCA Subpart D Cleanup Standards Low-Occupancy Areas- uncapped *			**25**

**** Requires a deed restriction on the property.***

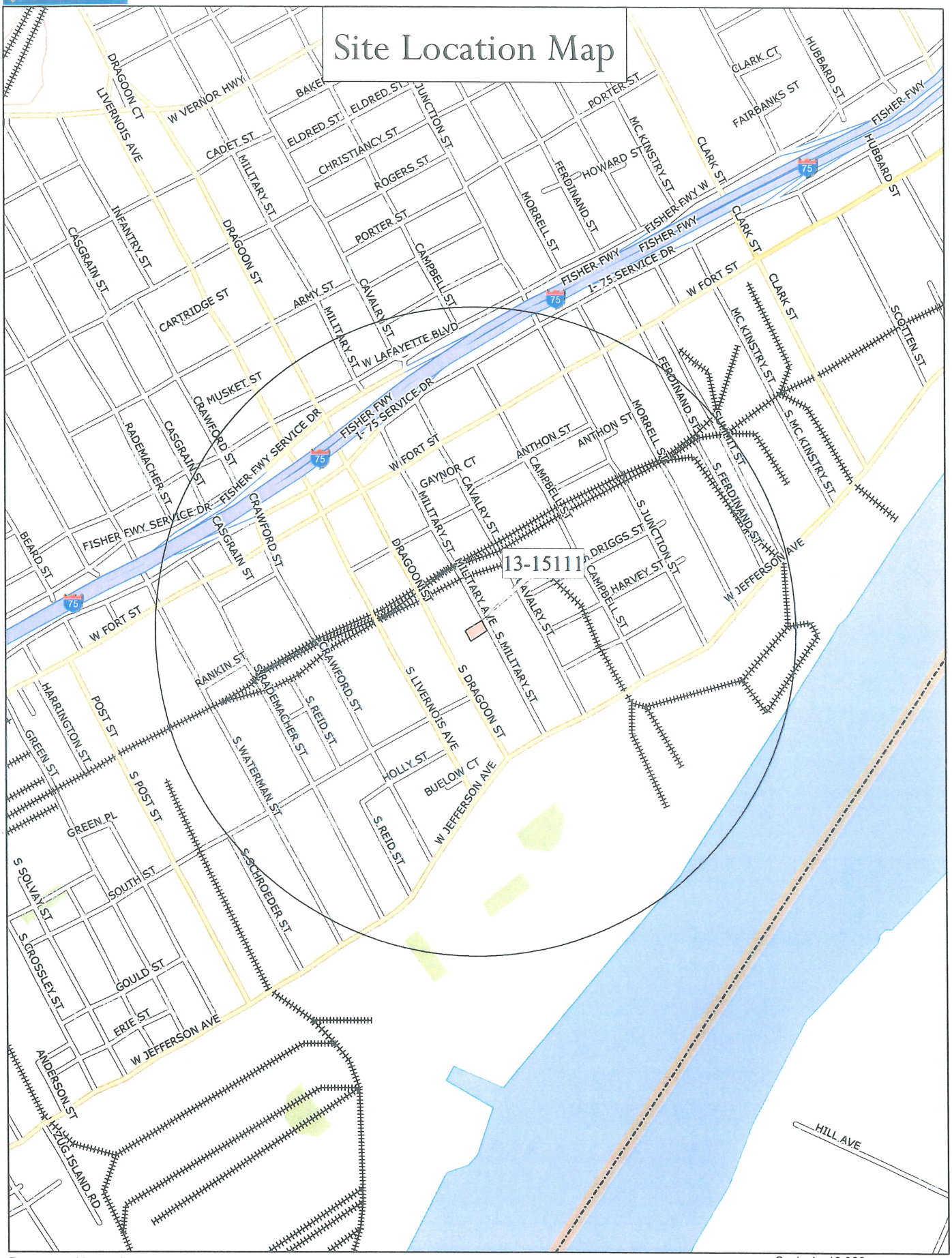
NOTES:

1. All values expressed in mg/ kg.
2. MDEQ Generic Residential and Non-Residential Direct Contact Criteria from Part 201 Generic Cleanup Criteria and Screening Levels dated September 28, 2012.
3. TSCA Cleanup Standards from 40CFR Part 761, Subpart D.

Attachment I

Site Location Map

Site Location Map



Data use subject to license.

www.delorme.com

TN

MN (7.4°W)

Scale 1 : 12,800

0 200 400 600 800 1000 ft

0 100 200 300 400 500 m

1" = 1,066.7 ft

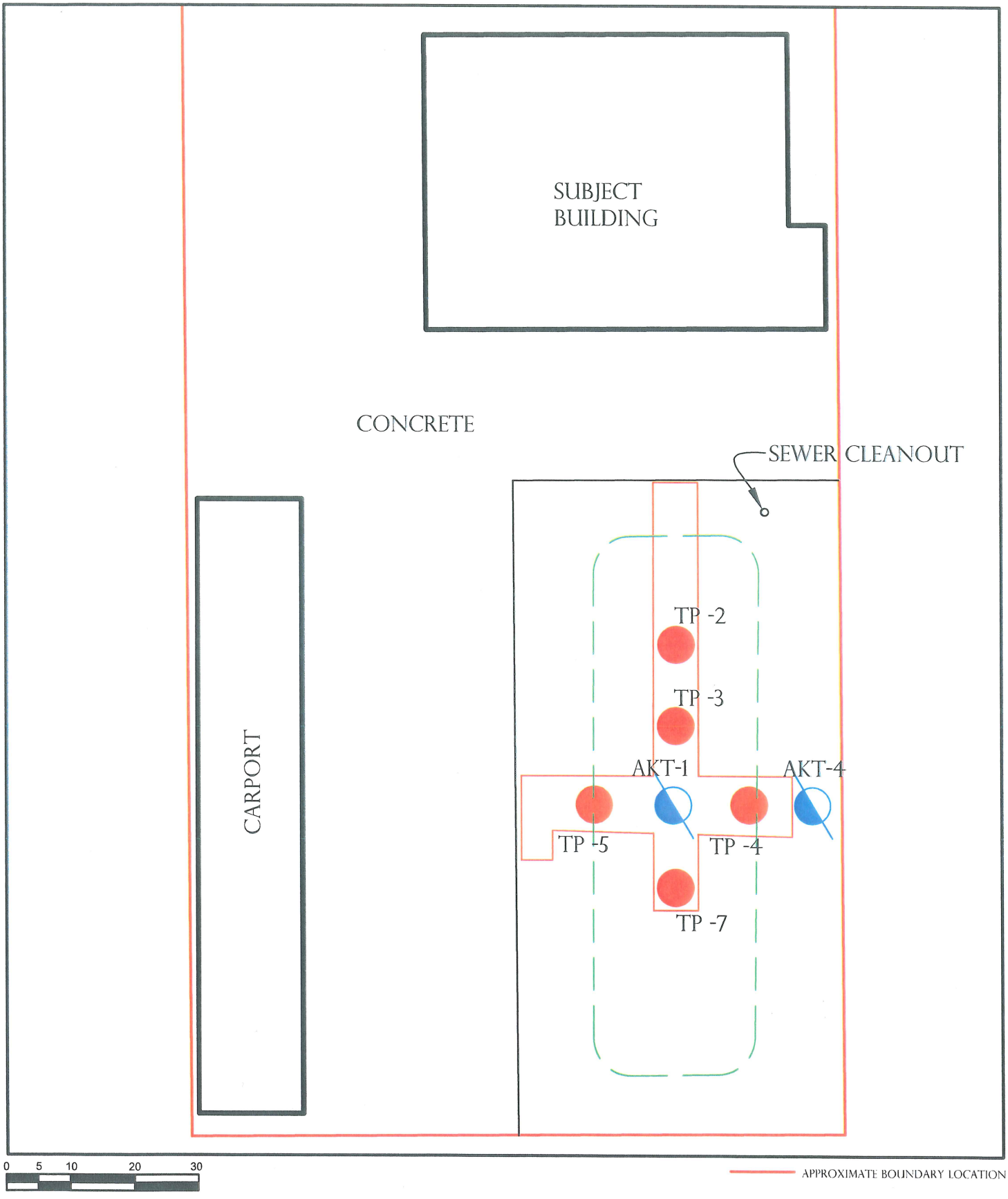
Data Zoom 14-0

Attachment II

Site Sketch

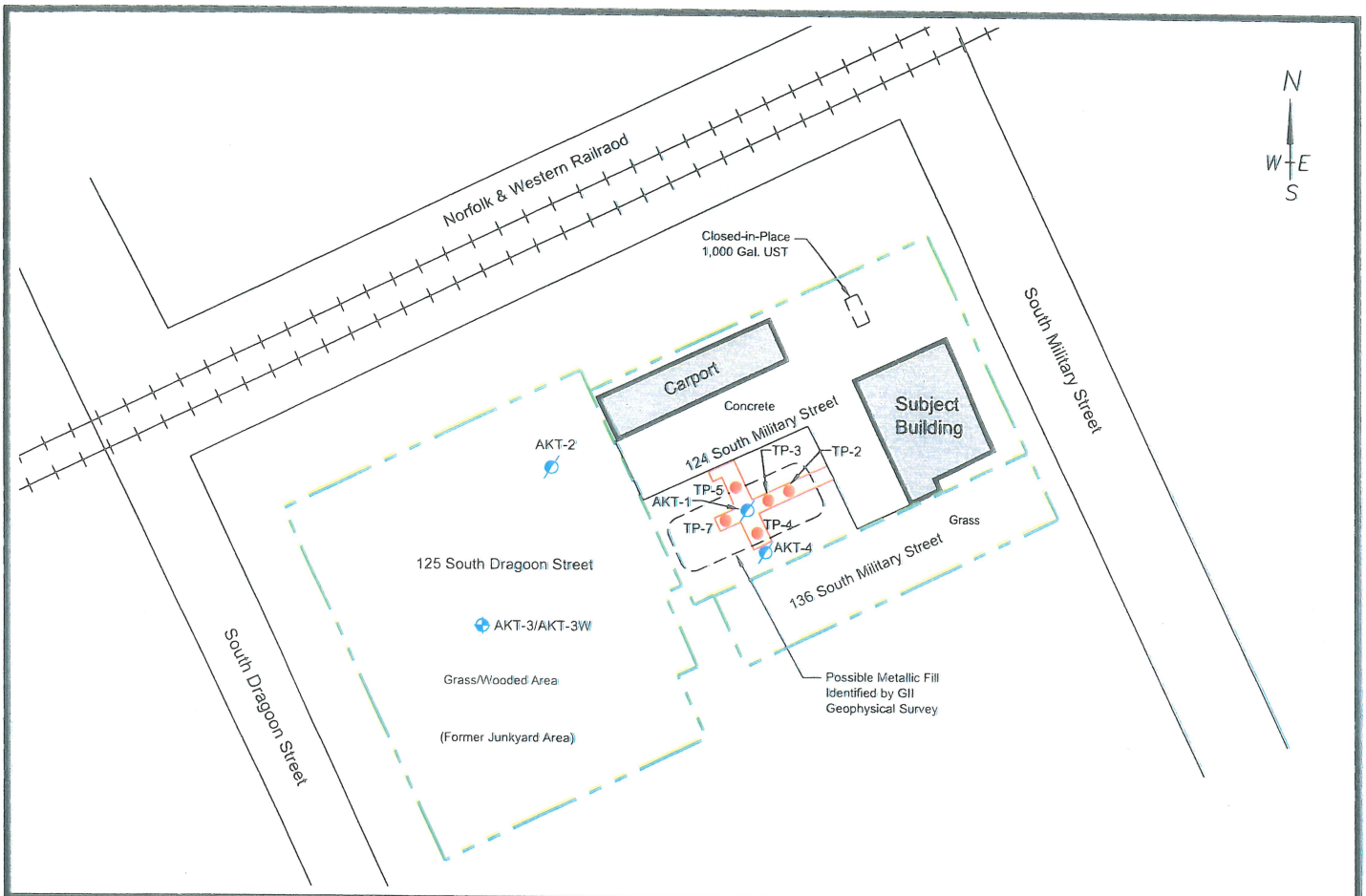
McDowell & Associates

Site Map



Attachment III

Sample Location Map



AKTPEERLESS
environmental & energy services
CHICAGO DETROIT FARMINGTON LANSING SAGINAW
www.aktpeerless.com

SITE MAP WITH TEST PIT, SOIL SAMPLE, AND TEMPORARY MONITORING WELL LOCATIONS

125 SOUTH DRAGOON STREET, 124 AND 136 SOUTH MILITARY STREET
DETROIT, MICHIGAN
PROJECT NUMBER : 7203F-3-20

LEGEND
= PROPERTY LINE
= PARCEL LINE
= AKT PEERLESS TEMPORARY MONITORING WELL
= AKT PEERLESS SOIL BORING
= GRAB SAMPLE LOCATION
= TEST PIT EXCAVATION AREA

DRAWN BY: JWB
DATE: 10/26/2011
0 30 60
SCALE: 1" = 60' ±0

FIGURE 2

Attachment IV

Log of Soil Boring Sheets

AKTPEERLESS environmental & energy services 22725 Orchard Lake Road, Farmington, Michigan 48336 Phone: (248) 615-1333 Fax: (248) 615-1334	BORING LOG 125 South Dragoon Street, 124 & 136 South Military Street Detroit, MI 48209 AKT Peerless Project No. 7203F-1-20	AKT-1 Drawn By: DTI Date: 08/02/11

DRILLING COMPANY:	LaPointe Environmental	WEATHER:	Cloudy, 80 F
TECHNICIAN:	Dan LaPointe	BORING DEPTH:	12 Feet BGS
DATE DRILLED:	08/02/11	DEPTH TO GW:	Not Encountered
DRILLING METHOD:	GeoProbe	SCREEN INTERVAL:	NA
FIELD GEOLOGIST:	David Isabell	SCREEN MATERIAL:	NA

DEPTH FEET	SAMPLE INTERVAL	% RECOVERY	PID VALUE	USCS SOIL CLASS.	COLOR	GEOLOGIC DESCRIPTION	MOISTURE	TEMPORARY WELL DIAGRAM
						GRAVEL with vegetation		
2		100	NA	SW	brown reddish-brown	**SAND** with trace gravel, medium grained trace brick debris, trace fill material (glass)	M	
4					brown/gray	silty, fine grained	M	
6		100	NA					
8					dark gray	trace gravel, odor	M	
10		100	NA	CL	gray	**CLAY** soft, high plasticity	M	
12								
14		100	NA			medium stiffness	M	
16								
						End of Boring		
18								
20								

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Phone: (248) 615-1333 Fax: (248) 615-1334

BORING LOG

125 South Dragoon Street,
124 & 136 South Military Street
Detroit, MI 48209
AKT Peerless Project No. 7203F-1-20

AKT-4

Drawn By: DTI
Date: 10/10/11

DRILLING COMPANY:	AKT Peerless	WEATHER:	Cloudy, 60 F
TECHNICIAN:	Pat Hall	BORING DEPTH:	16 Feet BGS
DATE DRILLED:	09/19/11	DEPTH TO GW:	Not Encountered
DRILLING METHOD:	GeoProbe	SCREEN INTERVAL:	NA
FIELD GEOLOGIST:	David Isabell	SCREEN MATERIAL:	NA

DEPTH FEET	SAMPLE INTERVAL	% RECOVERY	PID VALUE	USCS SOIL CLASS.	COLOR	GEOLOGIC DESCRIPTION	MOISTURE	TEMPORARY WELL DIAGRAM
						GRAVEL with vegetation		
2		100	NA	SW	reddish brown black black	**SAND** with gravel, fill material (glass, plastic, brick), fine grained, loose, apparent staining and odor detected	M	
4					brown			
6		100	NA					
8					light brown			
10		100	NA	GW	black	**GRAVEL** with coarse sand, odor and staining detected	VM	
				CL	gray	**CLAY** medium stiff to stiff	M	
12								
14		100	NA					
16						End of Boring		
18								
20								

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Phone: (248) 615-1333 Fax: (248) 615-1334

TEST PIT LOG

125 Dragoon, 124 & 136 Military Street
Detroit, Michigan
AKT Peerless Project No. 7203F-3-20

TP-1

Drawn By: DTI
Date: 10/10/11

DIGGING COMPANY:	AKT Peerless	WEATHER:	Cloudy, 55F
TECHNICIAN:	Friedman Mechanical	BORING DEPTH:	10 Feet BGS
DATE DRILLED:	09/28/11	DEPTH TO GW:	Not Encountered
DIGGING METHOD:	Excavator	SCREEN INTERVAL:	NA
FIELD GEOLOGIST:	David Isabell	SCREEN MATERIAL:	NA

DEPTH FEET	SAMPLE INTERVAL	% RECOVERY	PID VALUE	USCS SOIL CLASS.	COLOR	GEOLOGIC DESCRIPTION	MOISTURE	TEMPORARY WELL DIAGRAM
						GRAVEL with topsoil and vegetation		
				SP	dark brown	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
						CONCRETE SLAB		
2				SP	black	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
4		100	N/A		brown			
6								
8								
				GW	brown/gray	**GRAVEL** apparent staining and odor detected	M	
10				CL	brown/gray	**CLAY** medium stiff, mottled	M	
						End of Test Pit		
12								
14								
16								
18								
20								

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TEST PIT LOG

125 Dragoon, 124 & 136 Military Street
Detroit, Michigan
AKT Peerless Project No. 7203F-3-20

TP-2

Drawn By: DTI
Date: 10/10/11

DIGGING COMPANY:	AKT Peerless	WEATHER:	Cloudy, 55F
TECHNICIAN:	Friedman Mechanical	BORING DEPTH:	10 Feet BGS
DATE DRILLED:	09/28/11	DEPTH TO GW:	Not Encountered
DIGGING METHOD:	Excavator	SCREEN INTERVAL:	NA
FIELD GEOLOGIST:	David Isabell	SCREEN MATERIAL:	NA

DEPTH FEET	SAMPLE INTERVAL	% RECOVERY	PID VALUE	USCS SOIL CLASS.	COLOR	GEOLOGIC DESCRIPTION	MOISTURE	TEMPORARY WELL DIAGRAM
						GRAVEL with topsoil and vegetation		
				SP	dark brown	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
2						**CONCRETE SLAB**		
				SP	black	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
4		100	N/A		brown			
6								
8								
				GW	brown/gray	**GRAVEL** apparent staining and odor detected	M	
10				CL	brown/gray	**CLAY** medium stiff, mottled	M	
						End of Test Pit		
12								
14								
16								
18								
20								

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TEST PIT LOG

125 Dragoon, 124 & 136 Military Street
Detroit, Michigan
AKT Peerless Project No. 7203F-3-20

TP-3

Drawn By: DTI
Date: 10/10/11

DIGGING COMPANY:	AKT Peerless	WEATHER:	Cloudy, 55F
TECHNICIAN:	Friedman Mechanical	BORING DEPTH:	13 Feet BGS
DATE DRILLED:	09/28/11	DEPTH TO GW:	Not Encountered
DIGGING METHOD:	Excavator	SCREEN INTERVAL:	NA
FIELD GEOLOGIST:	David Isabell	SCREEN MATERIAL:	NA

DEPTH FEET	SAMPLE INTERVAL	% RECOVERY	PID VALUE	USCS SOIL CLASS.	COLOR	GEOLOGIC DESCRIPTION	MOISTURE	TEMPORARY WELL DIAGRAM
						GRAVEL with topsoil and vegetation		
				SP	dark brown	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
						CONCRETE SLAB		
2				SP	black	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
4					brown			
6		100	N/A					
8								
				GW	brown/gray	**GRAVEL** apparent staining and odor detected	M	
10				CL	brown/gray	**CLAY** medium stiff, mottled	M	
12								
						End of Test Pit		
14								
16								
18								
20								

AKTPEERLESS environmental & energy services 22725 Orchard Lake Road, Farmington, Michigan 48336 Phone: (248) 615-1333 Fax: (248) 615-1334	TEST PIT LOG 125 Dragoon, 124 & 136 Military Street Detroit, Michigan AKT Peerless Project No. 7203F-3-20	TP-4 Drawn By: DTI Date: 10/10/11

DIGGING COMPANY:	AKT Peerless	WEATHER:	Cloudy, 55F
TECHNICIAN:	Friedman Mechanical	BORING DEPTH:	13 Feet BGS
DATE DRILLED:	09/28/11	DEPTH TO GW:	Not Encountered
DIGGING METHOD:	Excavator	SCREEN INTERVAL:	NA
FIELD GEOLOGIST:	David Isabell	SCREEN MATERIAL:	NA

DEPTH FEET	SAMPLE INTERVAL	% RECOVERY	PID VALUE	USCS SOIL CLASS.	COLOR	GEOLOGIC DESCRIPTION	MOISTURE	TEMPORARY WELL DIAGRAM
						GRAVEL with topsoil and vegetation		
				SP	dark brown	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
						CONCRETE SLAB		
2				SP	black	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
4					brown			
6		100	N/A					
8								
				GW	brown/gray	**GRAVEL** apparent staining and odor detected	M	
10				CL	brown/gray	**CLAY** medium stiff, mottled	M	
12								
						End of Test Pit		
14								
16								
18								
20								

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TEST PIT LOG

125 Dragoon, 124 & 136 Military Street
Detroit, Michigan
AKT Peerless Project No. 7203F-3-20

TP-5

Drawn By: DTI
Date: 10/10/11

DIGGING COMPANY:	AKT Peerless	WEATHER:	Cloudy, 55F
TECHNICIAN:	Friedman Mechanical	BORING DEPTH:	10 Feet BGS
DATE DRILLED:	09/28/11	DEPTH TO GW:	Not Encountered
DIGGING METHOD:	Excavator	SCREEN INTERVAL:	NA
FIELD GEOLOGIST:	David Isabell	SCREEN MATERIAL:	NA

DEPTH FEET	SAMPLE INTERVAL	% RECOVERY	PID VALUE	USCS SOIL CLASS.	COLOR	GEOLOGIC DESCRIPTION	MOISTURE	TEMPORARY WELL DIAGRAM
						GRAVEL with topsoil and vegetation		
				SP	dark brown	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
						CONCRETE SLAB		
2				SP	black	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
4		100	N/A		brown			
6								
8								
				GW	brown/gray	**GRAVEL** apparent staining and odor detected	M	
10				CL	brown/gray	**CLAY** medium stiff, mottled	M	
						End of Test Pit		
12								
14								
16								
18								
20								

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TEST PIT LOG

125 Dragoon, 124 & 136 Military Street
Detroit, Michigan
AKT Peerless Project No. 7203F-3-20

TP-7

Drawn By: DTI
Date: 10/10/11

DIGGING COMPANY:	AKT Peerless	WEATHER:	Cloudy, 55F
TECHNICIAN:	Friedman Mechanical	BORING DEPTH:	10 Feet BGS
DATE DRILLED:	09/28/11	DEPTH TO GW:	Not Encountered
DIGGING METHOD:	Excavator	SCREEN INTERVAL:	NA
FIELD GEOLOGIST:	David Isabell	SCREEN MATERIAL:	NA

DEPTH FEET	SAMPLE INTERVAL	% RECOVERY	PID VALUE	USCS SOIL CLASS.	COLOR	GEOLOGIC DESCRIPTION	MOISTURE	TEMPORARY WELL DIAGRAM
						GRAVEL with topsoil and vegetation		
				SP	dark brown	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
						CONCRETE SLAB		
2				SP	black	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
4		100	N/A		brown			
6								
8								
				GW	brown/gray	**GRAVEL** apparent staining and odor detected	M	
10				CL	brown/gray	**CLAY** medium stiff, mottled	M	
						End of Test Pit		
12								
14								
16								
18								
20								

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TEST PIT LOG

125 Dragoon, 124 & 136 Military Street
Detroit, Michigan
AKT Peerless Project No. 7203F-3-20

AKT-1

Drawn By: DTI
Date: 10/10/11

DIGGING COMPANY:	AKT Peerless	WEATHER:	Cloudy, 55F
TECHNICIAN:	Friedman Mechanical	BORING DEPTH:	13 Feet BGS
DATE DRILLED:	09/28/11	DEPTH TO GW:	Not Encountered
DIGGING METHOD:	Excavator	SCREEN INTERVAL:	NA
FIELD GEOLOGIST:	David Isabell	SCREEN MATERIAL:	NA

DEPTH FEET	SAMPLE INTERVAL	% RECOVERY	PID VALUE	USCS SOIL CLASS.	COLOR	GEOLOGIC DESCRIPTION	MOISTURE	TEMPORARY WELL DIAGRAM
						GRAVEL with topsoil and vegetation		
				SP	dark brown	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
2						**CONCRETE SLAB**		
				SP	black	**SAND** with fill material (metal, brick, etc.) and apparent staining, odor detected	M	
4					brown			
6		100	N/A					
8								
				GW	brown/gray	**GRAVEL** apparent staining and odor detected	M	
10				CL	brown/gray	**CLAY** medium stiff, mottled	M	
12								
						End of Test Pit		
14								
16								
18								
20								

Attachment V

Chemical Test Results

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	AKT-1 (8-9)	Chain of Custody:	106981
Client Project Name:	7203F-1-20	Sample No:	1	Collect Date:	08/02/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — Aliquot ID: 45680-001A — Matrix: Soil/Solid — Analyst: BMG

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	13		%	0.1	1.0	08/03/11	MC110803	08/04/11	MC110803

Trace Elements by ICP/MS (EPA 0200.2-M/EPA 6020A) — Aliquot ID: 45680-001A — Matrix: Soil/Solid — Analyst: JLH

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Antimony	10000	J,L+	µg/kg	300	20	08/05/11	PT11H05D	08/05/11	T211H05A
2. Arsenic	7400		µg/kg	100	20	08/04/11	PT11H04B	08/04/11	T211H04A
3. Barium	79000		µg/kg	1000	20	08/04/11	PT11H04B	08/04/11	T211H04A
4. Beryllium	U		µg/kg	500	20	08/04/11	PT11H04B	08/04/11	T211H04A
5. Cadmium	3600		µg/kg	50	20	08/04/11	PT11H04B	08/04/11	T211H04A
6. Chromium	51000		µg/kg	500	20	08/04/11	PT11H04B	08/04/11	T211H04A
7. Copper	190000		µg/kg	1000	20	08/04/11	PT11H04B	08/04/11	T211H04A
8. Lead	250000		µg/kg	1000	200	08/04/11	PT11H04B	08/05/11	T211H05A
9. Nickel	52000		µg/kg	1000	20	08/04/11	PT11H04B	08/04/11	T211H04A
10. Selenium	510		µg/kg	200	20	08/04/11	PT11H04B	08/04/11	T211H04A
11. Silver	280		µg/kg	100	20	08/04/11	PT11H04B	08/04/11	T211H04A
12. Thallium	U		µg/kg	500	20	08/04/11	PT11H04B	08/04/11	T211H04A
13. Zinc	790000		µg/kg	10000	200	08/04/11	PT11H04B	08/05/11	T211H05A

Mercury by CVAAS (EPA 7471B) — Aliquot ID: 45680-001A — Matrix: Soil/Solid — Analyst: MAP

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Mercury	340		µg/kg	50	10	08/03/11	PM11H03E	08/05/11	M411H05A

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) — Aliquot ID: 45680-001A — Matrix: Soil/Solid — Analyst: BDA

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U		µg/kg	760	100	08/05/11	PS11H05A	08/08/11	SB11H08A
2. Aroclor-1221	U		µg/kg	760	100	08/05/11	PS11H05A	08/08/11	SB11H08A
3. Aroclor-1232	U		µg/kg	760	100	08/05/11	PS11H05A	08/08/11	SB11H08A
4. Aroclor-1242	U		µg/kg	760	100	08/05/11	PS11H05A	08/08/11	SB11H08A
5. Aroclor-1248	U		µg/kg	760	100	08/05/11	PS11H05A	08/08/11	SB11H08A
6. Aroclor-1254	8500		µg/kg	760	100	08/05/11	PS11H05A	08/08/11	SB11H08A
7. Aroclor-1260	U		µg/kg	760	100	08/05/11	PS11H05A	08/08/11	SB11H08A
8. Aroclor-1262 (NN)	U		µg/kg	760	100	08/05/11	PS11H05A	08/08/11	SB11H08A
9. Aroclor-1268 (NN)	U		µg/kg	760	100	08/05/11	PS11H05A	08/08/11	SB11H08A

Volatile Organic Compounds (VOCs) by GC/MS, 5035 (EPA 5035/EPA 8260B) — Aliquot ID: 45680-001 — Matrix: Soil/Solid — Analyst: JAS

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Acetone	U		µg/kg	1000	1.0	08/08/11	V911H08A	08/08/11	V911H08A

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	AKT-1 (8-9)	Chain of Custody:	106981
Client Project Name:	7203F-1-20	Sample No:	1	Collect Date:	08/02/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS, 5035 (EPA 5035/EPA 8260B) **Aliquot ID: 45680-001** **Matrix: Soil/Solid** **Analyst: JAS**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
2. Acrylonitrile	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
3. Benzene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
4. Bromobenzene	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
5. Bromochloromethane	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
6. Bromodichloromethane	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
7. Bromoform	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
8. Bromomethane	U		µg/kg	200	1.0	08/08/11	V911H08A	08/08/11	V911H08A
9. 2-Butanone	U		µg/kg	750	1.0	08/08/11	V911H08A	08/08/11	V911H08A
10. n-Butylbenzene	160		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
11. sec-Butylbenzene	130		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
12. tert-Butylbenzene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
13. Carbon Disulfide	U		µg/kg	250	1.0	08/08/11	V911H08A	08/08/11	V911H08A
14. Carbon Tetrachloride	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
15. Chlorobenzene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
16. Chloroethane	U		µg/kg	250	1.0	08/08/11	V911H08A	08/08/11	V911H08A
17. Chloroform	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
18. Chloromethane	U		µg/kg	250	1.0	08/08/11	V911H08A	08/08/11	V911H08A
19. 2-Chlorotoluene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
20. Dibromochloromethane	U		µg/kg	110	1.0	08/08/11	V911H08A	08/08/11	V911H08A
21. 1,2-Dibromo-3-chloropropane (NN)	U		µg/kg	10	1.0	08/08/11	V911H08A	08/08/11	V911H08A
22. Dibromomethane	U		µg/kg	250	1.0	08/08/11	V911H08A	08/08/11	V911H08A
23. 1,2-Dichlorobenzene	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
24. 1,3-Dichlorobenzene	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
25. 1,4-Dichlorobenzene	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
26. Dichlorodifluoromethane	U		µg/kg	250	1.0	08/08/11	V911H08A	08/08/11	V911H08A
27. 1,1-Dichloroethane	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
28. 1,2-Dichloroethane	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
29. 1,1-Dichloroethene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
30. cis-1,2-Dichloroethene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
31. trans-1,2-Dichloroethene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
32. 1,2-Dichloropropane	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
33. cis-1,3-Dichloropropene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
34. trans-1,3-Dichloropropene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
35. Ethylbenzene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
36. Ethylene Dibromide	U		µg/kg	20	1.0	08/08/11	V911H08A	08/08/11	V911H08A
37. 2-Hexanone	U		µg/kg	2500	1.0	08/08/11	V911H08A	08/08/11	V911H08A
38. Isopropylbenzene	U		µg/kg	250	1.0	08/08/11	V911H08A	08/08/11	V911H08A
39. Methyl Iodide	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
40. Methylene Chloride	U		µg/kg	110	1.0	08/08/11	V911H08A	08/08/11	V911H08A
41. 4-Methyl-2-pentanone	U		µg/kg	2500	1.0	08/08/11	V911H08A	08/08/11	V911H08A

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	AKT-1 (8-9)	Chain of Custody:	106981
Client Project Name:	7203F-1-20	Sample No:	1	Collect Date:	08/02/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS, 5035 (EPA 5035/EPA 8260B) **Aliquot ID: 45680-001** **Matrix: Soil/Solid** **Analyst: JAS**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
42. MTBE	U		µg/kg	250	1.0	08/08/11	V911H08A	08/08/11	V911H08A
43. Naphthalene	**880**		µg/kg	330	1.0	08/08/11	V911H08A	08/08/11	V911H08A
44. n-Propylbenzene	**250**		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
45. Styrene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
46. 1,1,1,2-Tetrachloroethane	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
47. 1.1,2,2-Tetrachloroethane	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
48. Tetrachloroethene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
49. Toluene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
50. 1,2,4-Trichlorobenzene	U		µg/kg	330	1.0	08/08/11	V911H08A	08/08/11	V911H08A
51. 1,1,1-Trichloroethane	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
52. 1,1,2-Trichloroethane	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
53. Trichloroethene	U		µg/kg	50	1.0	08/08/11	V911H08A	08/08/11	V911H08A
54. Trichlorofluoromethane	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
55. 1,2,3-Trichloropropane	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
56. 1,2,3-Trimethylbenzene (NN)	**850**		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
57. 1,2,4-Trimethylbenzene	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
58. 1,3,5-Trimethylbenzene	U		µg/kg	100	1.0	08/08/11	V911H08A	08/08/11	V911H08A
59. Vinyl Chloride	U		µg/kg	40	1.0	08/08/11	V911H08A	08/08/11	V911H08A
60. Xylenes	U		µg/kg	150	1.0	08/08/11	V911H08A	08/08/11	V911H08A

Base/Neutral/Acid Semivolatiles by GC/MS (EPA 3550C/EPA 8270C) **Aliquot ID: 45680-001A** **Matrix: Soil/Solid** **Analyst: TMC**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Acenaphthene	**7000**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
2. Acenaphthylene	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
3. Aniline	U	J,V-	µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
4. Anthracene	**17000**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
5. Azobenzene (NN)	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
6. Benzo(a)anthracene	**21000**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
7. Benzo(a)pyrene	**18000**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
8. Benzo(b)fluoranthene	**22000**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
9. Benzo(ghi)perylene	**7000**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
10. Benzo(k)fluoranthene	**7900**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
11. Benzyl Alcohol	U		µg/kg	3300	50	08/05/11	PS11H05A	08/06/11	S111H05C
12. Bis(2-chloroethoxy)methane	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
13. Bis(2-chloroethyl)ether	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
14. Bis(2-chloroisopropyl) Ether	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
15. Bis(2-ethylhexyl)phthalate (NN)	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
16. 4-Bromophenyl Phenylether (NN)	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
17. Butyl Benzyl Phthalate	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
18. Carbazole (NN)	**4900**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	AKT-1 (8-9)	Chain of Custody:	106981
Client Project Name:	7203F-1-20	Sample No:	1	Collect Date:	08/02/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Base/Neutral/Acid Semivolatiles by GC/MS (EPA 3550C/EPA 8270C) **Aliquot ID: 45680-001A** **Matrix: Soil/Solid** **Analyst: TMC**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
19. 4-Chloro-3-methylphenol	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
20. 2-Chloronaphthalene	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
21. 2-Chlorophenol	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
22. 4-Chlorophenyl Phenylether	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
23. Chrysene	**19000**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
24. Dibenzo(a,h)anthracene	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
25. Dibenzofuran	**6500**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
26. 2,4-Dichlorophenol	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
27. Diethyl Phthalate	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
28. Dimethyl Phthalate	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
29. 2,4-Dimethylphenol	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
30. Di-n-butyl Phthalate	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
31. 2,4-Dinitrophenol	U		µg/kg	19000	50	08/05/11	PS11H05A	08/06/11	S111H05C
32. 2,4-Dinitrotoluene (NN)	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
33. 2,6-Dinitrotoluene (NN)	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
34. Di-n-octyl Phthalate	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
35. Fluoranthene	**60000**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
36. Fluorene	**10000**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
37. Hexachlorobenzene	U	J,V-	µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
38. Hexachlorobutadiene	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
39. Hexachlorocyclopentadiene	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
40. Indeno(1,2,3-cd)pyrene	**8200**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
41. Isophorone	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
42. 2-Methyl-4,6-dinitrophenol (NN)	U		µg/kg	19000	50	08/05/11	PS11H05A	08/06/11	S111H05C
43. 2-Methylnaphthalene	**2600**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
44. 2-Methylphenol (NN)	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
45. 3&4-Methylphenol (NN)	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
46. 2-Nitroaniline	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
47. 3-Nitroaniline	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
48. 4-Nitroaniline	U		µg/kg	3800	50	08/05/11	PS11H05A	08/06/11	S111H05C
49. Nitrobenzene	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
50. 2-Nitrophenol	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
51. 4-Nitrophenol	U		µg/kg	19000	50	08/05/11	PS11H05A	08/06/11	S111H05C
52. N-Nitrosodimethylamine	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
53. N-Nitrosodi-n-propylamine	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
54. N-Nitrosodiphenylamine	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
55. Pentachlorophenol	U		µg/kg	9600	50	08/05/11	PS11H05A	08/06/11	S111H05C
56. Phenanthrene	**69000**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
57. Phenol	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
58. Pyrene	**46000**		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	AKT-1 (8-9)	Chain of Custody:	106981
Client Project Name:	7203F-1-20	Sample No:	1	Collect Date:	08/02/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Base/Neutral/Acid Semivolatiles by GC/MS (EPA 3550C/EPA 8270C) **Aliquot ID: 45680-001A** **Matrix: Soil/Solid** **Analyst: TMC**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
59. Pyridine	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
60. 2,4,5-Trichlorophenol	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C
61. 2,4,6-Trichlorophenol	U		µg/kg	1900	50	08/05/11	PS11H05A	08/06/11	S111H05C

Fibertec environmental services

Analytical Laboratory
1914 Holloway Drive
Holt, MI 48842
Phone: 517 699 0345
Fax: 517 699 0388
email: lab@fibertec.us

8660 S. Mackinaw Trail
Cadillac, MI 49601
Phone: 231 775 8368
Fax: 231 775 8584

Industrial Hygiene Services, Inc.
1914 Holloway Drive
Holt, MI 48842
Phone: 517 699 0345
Fax: 517 699 0382
email: asbestos@fibertec.us

Geoprobe
11766 E. Grand River
Brighton, MI 48116
Phone: 810 220 3300
Fax: 810 220 3311

Chain of Custody # 106981
PAGE 1 of 1

Client Name: AKT PEERLESS
Contact Person: DAVID ISABELL
Project Name/ Number: 7023F-1-20
Purchase Order#

Lab Sample #	Date	Time	Client Sample #	Client Sample Descriptor	MATRIX (SEE RIGHT CORNER FOR CODE)	# OF CONTAINERS	PRESERVED (Y/N)	VOCs	BNAs	13 PPMs (+ Barium)	PCBs	Remarks
	8/2/11			AKT-1 (8-9)	S	3	y	X	X	X	X	
	8/2/11			AKT-2 (3-4)	S	3	y	X	X	X	X	
	8/2/11			AKT-3 (0.5-2.5)	S	3	y	X	X	X	X	
	8/2/11			AKT-3W	GW	3	y	X	X	X		*ONLY HAVE 2 HCl VOAs; UNSURE IF BNAs CAN BE ANALYZED FOR AKT-3W

Turnaround
- 24 hour RUSH (surcharge applies)
- 48 hour RUSH (surcharge applies)
- 72 hour RUSH (surcharge applies)
- [X] Standard (5-7 bus. days)
- Other, Specify

Matrix Code
S Soil; GW Ground Water; W Water; SW Surface Water; A Air; WW Waste Water; O Oil; X Other: Specify; P Wipe

Comments:

Relinquished By:	Date/ Time	Received By:
DAVID ISABELL	8/2/11 1145 PM	
Relinquished By:	Date/ Time	Received By:
	8/2/11 3:45	
Relinquished By:	Date/ Time	Received By Laboratory:

LAB USE ONLY:
Fibertec project number: 45680
Laboratory Tracking:
Temperature at Receipt:

COC Revision: April, 2006

TERMS & CONDITIONS ON BACK

4.5

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	AKT-3 (0-0.5)	Chain of Custody:	75848
Client Project Name:	7203F-1-20	Sample No:	1	Collect Date:	09/19/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — **Aliquot ID: 46431-001** — **Matrix: Soil/Solid** — **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	19		%	0.1	1.0	09/21/11	MC110921	09/22/11	MC110921

Chromium, Hexavalent (EPA 3060A/EPA 7196A) — **Aliquot ID: 46431-001** — **Matrix: Soil/Solid** — **Analyst: HLL**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Chromium VI	U		µg/kg	3100	1.0	09/22/11	WF11I22A	09/23/11	WF11I23A

Definitions/ Qualifiers:

- **A:** Spike recovery or precision unusable due to dilution.
- **B:** The analyte was detected in the associated method blank.
- **E:** The analyte was detected at a concentration greater than the calibration range, therefore the result is estimated.
- **J:** The concentration is an estimated value.
- **M:** Modified Method
- **U:** The analyte was not detected at or above the reporting limit.
- **X:** Matrix Interference has resulted in a raised reporting limit or distorted result.
- **W:** Results reported on a wet-weight basis.
- ***:** Value reported is outside QA limits

Exception Summary:

ACCREDITED IN ACCORDANCE WITH nelac

Accreditation Number:

E-10395

Fibertec environmental services

Analytical Laboratory
1914 Holloway Drive
Holt, MI 48842
Phone: 517 699 0345
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Brighton, MI 48116
Phone: 810 220 3300
Fax: 810 220 3311

Chain of Custody # 75848

PAGE ____ of ____

Client Name: AKT PEERLESS

Contact Person: DAVID ISABELL

Project Name/ Number: 7203F-1-20

Purchase Order#

Lab Sample #	Date	Time	Client Sample #	Client Sample Descriptor	MATRIX (SEE RIGHT CORNER FOR CODE)	# OF CONTAINERS	PRESERVED (Y/N)	PARAMETERS: Hexavalent Chromium
	9/19/11			AKT-3 (0-0.5)	S	1	N	X

Turnaround:
- [ ] 24 hour RUSH (surcharge applies)
- [ ] 48 hour RUSH (surcharge applies)
- [ ] 72 hour RUSH (surcharge applies)
- [X] Standard (5-7 bus. days)
- [ ] Other: Specify

Remarks: Chromium VI

Matrix Code:
- [S] Soil
- [GW] Ground Water
- [W] Water
- [SW] Surface Water
- [A] Air
- [WW] Waste Water
- [O] Oil
- [X] Other: Specify
- [P] Wipe

Comments:

Relinquished By: DAVID ISABELL	Date/ Time 9/20/11	Received By: 9/20/11 12:20
Relinquished By:	Date/ Time 9/20/11 14:52	Received By:
Relinquished By:	Date/ Time	Received By Laboratory:

LAB USE ONLY:
Fibertec project number: 46431
Laboratory Tracking:
Temperature at Receipt: 3.9 C

COC Revision: April, 2006

TERMS & CONDITIONS ON BACK

Fibertec
environmental
services

Friday, September 30, 2011

Fibertec Project Number: 46594
Project Identification: 7203F-3-20 /
Submittal Date: 09/29/2011

Mr. David Isabell
AKT Peerless Environ. Svcs, Inc. - Farm. Hills
22725 Orchard Lake Road
Farmington Hills, MI 48336

Dear Mr. Isabell,

Thank you for selecting Fibertec Environmental Services as your analytical laboratory. The samples you submitted have been analyzed in accordance with NELAC standards and the results compiled in the attached report. Any exceptions to NELAC compliance are noted in the report. These results apply only to those samples submitted. Please note samples will be disposed of 30 days after reporting date.

If you have any questions regarding these results or if we may be of further assistance to you, please contact me at (517) 699-0345.

Sincerely,

Daryl P. Strandbergh
Laboratory Director

DPS/kc

Enclosures

Client Identification:	**AKT Peerless Environ. Svcs, Inc. - Farm. Hills**	Sample Description:	**AKT-1 (10-10.5)**	Chain of Custody:	**100834**
Client Project Name:	**7203F-3-20**	Sample No:	**1**	Collect Date:	**09/28/11**
Client Project No:	**NA**	Sample Matrix:	**Soil/Solid**	Collect Time:	**NA**

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) **Aliquot ID: 46594-001** **Matrix: Soil/Solid** **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	**19**		%	0.1	1.0	09/29/11	MC110929	09/30/11	MC110929

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) **Aliquot ID: 46594-001** **Matrix: Soil/Solid** **Analyst: BDA**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
2. Aroclor-1221	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
3. Aroclor-1232	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
4. Aroclor-1242	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
5. Aroclor-1248	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
6. Aroclor-1254	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
7. Aroclor-1260	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
8. Aroclor-1262 (NN)	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
9. Aroclor-1268 (NN)	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	TP-3 (2-3)	Chain of Custody:	100834
Client Project Name:	7203F-3-20	Sample No:	2	Collect Date:	09/28/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — **Aliquot ID: 46594-002** — **Matrix: Soil/Solid** — **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	**59**		%	0.1	1.0	09/29/11	MC110929	09/30/11	MC110929

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) — **Aliquot ID: 46594-002** — **Matrix: Soil/Solid** — **Analyst: BDA**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U		µg/kg	400	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
2. Aroclor-1221	U		µg/kg	400	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
3. Aroclor-1232	U		µg/kg	400	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
4. Aroclor-1242	U		µg/kg	400	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
5. Aroclor-1248	U		µg/kg	400	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
6. Aroclor-1254	**2400**		µg/kg	400	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
7. Aroclor-1260	U		µg/kg	400	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
8. Aroclor-1262 (NN)	U		µg/kg	400	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
9. Aroclor-1268 (NN)	U		µg/kg	400	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	TP-3 (8-9)	Chain of Custody:	100834
Client Project Name:	7203F-3-20	Sample No:	3	Collect Date:	09/28/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — **Aliquot ID: 46594-003** — **Matrix: Soil/Solid** — **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	18		%	0.1	1.0	09/29/11	MC110929	09/30/11	MC110929

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) — **Aliquot ID: 46594-003** — **Matrix: Soil/Solid** — **Analyst: BDA**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
2. Aroclor-1221	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
3. Aroclor-1232	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
4. Aroclor-1242	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
5. Aroclor-1248	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
6. Aroclor-1254	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
7. Aroclor-1260	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
8. Aroclor-1262 (NN)	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A
9. Aroclor-1268 (NN)	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SA11I30A

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	TP-4 (2-3)	Chain of Custody:	100834
Client Project Name:	7203F-3-20	Sample No:	4	Collect Date:	09/28/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — **Aliquot ID: 46594-004** — **Matrix: Soil/Solid** — **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	**20**		%	0.1	1.0	09/29/11	MC110929	09/30/11	MC110929

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) — **Aliquot ID: 46594-004** — **Matrix: Soil/Solid** — **Analyst: BDA**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U		µg/kg	2100	50	09/30/11	PS11I30A	09/30/11	SA11I30A
2. Aroclor-1221	U		µg/kg	2100	50	09/30/11	PS11I30A	09/30/11	SA11I30A
3. Aroclor-1232	U		µg/kg	2100	50	09/30/11	PS11I30A	09/30/11	SA11I30A
4. Aroclor-1242	U		µg/kg	2100	50	09/30/11	PS11I30A	09/30/11	SA11I30A
5. Aroclor-1248	U		µg/kg	2100	50	09/30/11	PS11I30A	09/30/11	SA11I30A
6. Aroclor-1254	**7700**		µg/kg	2100	50	09/30/11	PS11I30A	09/30/11	SA11I30A
7. Aroclor-1260	U		µg/kg	2100	50	09/30/11	PS11I30A	09/30/11	SA11I30A
8. Aroclor-1262 (NN)	U		µg/kg	2100	50	09/30/11	PS11I30A	09/30/11	SA11I30A
9. Aroclor-1268 (NN)	U		µg/kg	2100	50	09/30/11	PS11I30A	09/30/11	SA11I30A

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	TP-4 (8-9)	Chain of Custody:	100834
Client Project Name:	7203F-3-20	Sample No:	5	Collect Date:	09/28/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — **Aliquot ID: 46594-005** — **Matrix: Soil/Solid** — **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	**17**		%	0.1	1.0	09/29/11	MC110929	09/30/11	MC110929

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) — **Aliquot ID: 46594-005** — **Matrix: Soil/Solid** — **Analyst: BDA**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U		µg/kg	20000	500	09/30/11	PS11I30A	09/30/11	SA11I30A
2. Aroclor-1221	U		µg/kg	20000	500	09/30/11	PS11I30A	09/30/11	SA11I30A
3. Aroclor-1232	U		µg/kg	20000	500	09/30/11	PS11I30A	09/30/11	SA11I30A
4. Aroclor-1242	U		µg/kg	20000	500	09/30/11	PS11I30A	09/30/11	SA11I30A
5. Aroclor-1248	U		µg/kg	20000	500	09/30/11	PS11I30A	09/30/11	SA11I30A
6. Aroclor-1254	**65000**		µg/kg	20000	500	09/30/11	PS11I30A	09/30/11	SA11I30A
7. Aroclor-1260	U		µg/kg	20000	500	09/30/11	PS11I30A	09/30/11	SA11I30A
8. Aroclor-1262 (NN)	U		µg/kg	20000	500	09/30/11	PS11I30A	09/30/11	SA11I30A
9. Aroclor-1268 (NN)	U		µg/kg	20000	500	09/30/11	PS11I30A	09/30/11	SA11I30A

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	TP-5 (2-3)	Chain of Custody:	100834
Client Project Name:	7203F-3-20	Sample No:	6	Collect Date:	09/28/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — **Aliquot ID: 46594-006** — **Matrix: Soil/Solid** — **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	19		%	0.1	1.0	09/29/11	MC110929	09/30/11	MC110929

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) — **Aliquot ID: 46594-006** — **Matrix: Soil/Solid** — **Analyst: BDA**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
2. Aroclor-1221	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
3. Aroclor-1232	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
4. Aroclor-1242	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
5. Aroclor-1248	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
6. Aroclor-1254	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
7. Aroclor-1260	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
8. Aroclor-1262 (NN)	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
9. Aroclor-1268 (NN)	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	TP-5 (8-9)	Chain of Custody:	100834
Client Project Name:	7203F-3-20	Sample No:	7	Collect Date:	09/28/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — **Aliquot ID: 46594-007** — **Matrix: Soil/Solid** — **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	13		%	0.1	1.0	09/29/11	MC110929	09/30/11	MC110929

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) — **Aliquot ID: 46594-007** — **Matrix: Soil/Solid** — **Analyst: BDA**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
2. Aroclor-1221	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
3. Aroclor-1232	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
4. Aroclor-1242	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
5. Aroclor-1248	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
6. Aroclor-1254	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
7. Aroclor-1260	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
8. Aroclor-1262 (NN)	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
9. Aroclor-1268 (NN)	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	TP-7 (2-3)	Chain of Custody:	100834
Client Project Name:	7203F-3-20	Sample No:	8	Collect Date:	09/28/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — **Aliquot ID: 46594-008** — **Matrix: Soil/Solid** — **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	18		%	0.1	1.0	09/29/11	MC110929	09/30/11	MC110929

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) — **Aliquot ID: 46594-008** — **Matrix: Soil/Solid** — **Analyst: BDA**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
2. Aroclor-1221	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
3. Aroclor-1232	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
4. Aroclor-1242	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
5. Aroclor-1248	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
6. Aroclor-1254	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
7. Aroclor-1260	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
8. Aroclor-1262 (NN)	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
9. Aroclor-1268 (NN)	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	TP-7 (8-9)	Chain of Custody:	100834
Client Project Name:	7203F-3-20	Sample No:	9	Collect Date:	09/28/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — **Aliquot ID: 46594-009** — **Matrix: Soil/Solid** — **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	21		%	0.1	1.0	09/29/11	MC110929	09/30/11	MC110929

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) — **Aliquot ID: 46594-009** — **Matrix: Soil/Solid** — **Analyst: BDA**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
2. Aroclor-1221	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
3. Aroclor-1232	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
4. Aroclor-1242	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
5. Aroclor-1248	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
6. Aroclor-1254	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
7. Aroclor-1260	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
8. Aroclor-1262 (NN)	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A
9. Aroclor-1268 (NN)	U		µg/kg	330	5.0	09/30/11	PS11I30A	09/30/11	SB11I30A

Definitions/ Qualifiers:

- **A:** Spike recovery or precision unusable due to dilution.
- **B:** The analyte was detected in the associated method blank.
- **E:** The analyte was detected at a concentration greater than the calibration range, therefore the result is estimated.
- **J:** The concentration is an estimated value.
- **M:** Modified Method
- **U:** The analyte was not detected at or above the reporting limit.
- **X:** Matrix Interference has resulted in a raised reporting limit or distorted result.
- **W:** Results reported on a wet-weight basis.
- ***:** Value reported is outside QA limits

Exception Summary:

ACCREDITED IN ACCORDANCE WITH nelac

Accreditation Number:

E-10395

Fibertec environmental services

Analytical Laboratory
1914 Holloway Drive
Holt, MI 48842
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Fax: 517 699 0388
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email: asbestos@fibertec.us

Geoprobe
11766 E. Grand River
Brighton, MI 48116
Phone: 810 220 3300
Fax: 810 220 3311

Chain of Custody # 100834
PAGE 1 of 1

Client Name: AKT PEERLESS
Contact Person: DAVID ISABELL
Project Name/ Number: 7203F-3-20
Purchase Order#

Turnaround: [X] 24 hour RUSH (surcharge applies); [ ] 48 hour RUSH (surcharge applies); [ ] 72 hour RUSH (surcharge applies); [ ] Standard (5-7 bus days); [ ] Other: Specify

Matrix Code: S Soil; GW Ground Water; W Water; SW Surface Water; A Air; WW Waste Water; O Oil; X Other: Specify; P Wipe

Lab Sample #	Date	Time	Client Sample #	Client Sample Descriptor	MATRIX (SEE RIGHT CORNER FOR CODE)	# OF CONTAINERS	PRESERVED (Y/N)	PCBs
	9/28/11			AKT-1 (10-10.5)	S	1	N	X
				TP-3 (2-3)	S	1	N	X
				TP-3 (8-9)	S	1	N	X
				TP-4 (2-3)	S	1	N	X
				TP-4 (8-9)	S	1	N	X
				TP-5 (2-3)	S	1	N	X
				TP-5 (8-9)	S	1	N	X
				TP-7 (2-3)	S	1	N	X
	↓			TP-7 (8-9)	S	1	N	X

Remarks: 24 hr turnaround as per Jessica Cary's conversation with Kyleen

Comments:

Relinquished By: DAVID ISABELL	Date/ Time 9/29/11	Received By: 9/29/11 12:00
Relinquished By:	Date/ Time 9/29/11 4:46	Received By:
Relinquished By:	Date/ Time	Received By Laboratory:

LAB USE ONLY:
Fibertec project number:
Laboratory Tracking:
Temperature at Receipt:

COC Revision: April, 2006

TERMS & CONDITIONS ON BACK

3.6

40594

Fibertec
environmental
services

Friday, October 07, 2011

Fibertec Project Number: 46666
Project Identification: 7203F-3-20 /
Submittal Date: 10/04/2011

Mr. David Isabell
AKT Peerless Environ. Svcs, Inc. - Farm. Hills
22725 Orchard Lake Road
Farmington Hills, MI 48336

Dear Mr. Isabell,

Thank you for selecting Fibertec Environmental Services as your analytical laboratory. The samples you submitted have been analyzed in accordance with NELAC standards and the results compiled in the attached report. Any exceptions to NELAC compliance are noted in the report. These results apply only to those samples submitted. Please note samples will be disposed of 30 days after reporting date.

As discussed, the extraction for samples 46666-001 (AKT-4 2-2.5) and 46666-002 (AKT-4 8.5-9) exceeded the 14 day hold time.

If you have any questions regarding these results or if we may be of further assistance to you, please contact me at (517) 699-0345.

Sincerely,

Daryl P. Strandbergh
Laboratory Director

DPS/kc

Enclosures

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	AKT-4 (2-2.5)	Chain of Custody:	100835
Client Project Name:	7203F-3-20	Sample No:	1	Collect Date:	09/19/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — **Aliquot ID: 46666-001A** — **Matrix: Soil/Solid** — **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	15		%	0.1	1.0	10/05/11	MC111005	10/06/11	MC111005

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) — **Aliquot ID: 46666-001A** — **Matrix: Soil/Solid** — **Analyst: BDA**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J05A
2. Aroclor-1221	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J05A
3. Aroclor-1232	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J05A
4. Aroclor-1242	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J05A
5. Aroclor-1248	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J05A
6. Aroclor-1254	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J05A
7. Aroclor-1260	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J05A
8. Aroclor-1262 (NN)	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J05A
9. Aroclor-1268 (NN)	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J05A

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	AKT-4 (8.5-9)	Chain of Custody:	100835
Client Project Name:	7203F-3-20	Sample No:	2	Collect Date:	09/19/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — **Aliquot ID: 46666-002A** — **Matrix: Soil/Solid** — **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	12		%	0.1	1.0	10/05/11	MC111005	10/06/11	MC111005

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) — **Aliquot ID: 46666-002A** — **Matrix: Soil/Solid** — **Analyst: BDA**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
2. Aroclor-1221	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
3. Aroclor-1232	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
4. Aroclor-1242	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
5. Aroclor-1248	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
6. Aroclor-1254	1200	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
7. Aroclor-1260	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
8. Aroclor-1262 (NN)	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
9. Aroclor-1268 (NN)	U	J,H	µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A

Client Identification:	AKT Peerless Environ. Svcs, Inc. - Farm. Hills	Sample Description:	TP-2 (2-3)	Chain of Custody:	100835
Client Project Name:	7203F-3-20	Sample No:	3	Collect Date:	09/28/11
Client Project No:	NA	Sample Matrix:	Soil/Solid	Collect Time:	NA

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — **Aliquot ID: 46666-003** — **Matrix: Soil/Solid** — **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	14		%	0.1	1.0	10/05/11	MC111005	10/06/11	MC111005

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) — **Aliquot ID: 46666-003** — **Matrix: Soil/Solid** — **Analyst: BDA**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
2. Aroclor-1221	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
3. Aroclor-1232	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
4. Aroclor-1242	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
5. Aroclor-1248	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
6. Aroclor-1254	1100		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
7. Aroclor-1260	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
8. Aroclor-1262 (NN)	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
9. Aroclor-1268 (NN)	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A

Client Identification:	**AKT Peerless Environ. Svcs, Inc. - Farm. Hills**	Sample Description:	**TP-2 (8-9)**	Chain of Custody:	**100835**
Client Project Name:	**7203F-3-20**	Sample No:	**4**	Collect Date:	**09/28/11**
Client Project No:	**NA**	Sample Matrix:	**Soil/Solid**	Collect Time:	**NA**

Sample Comments: **Soil results have been calculated and reported on a dry weight basis unless otherwise noted.**

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable NN: Parameter not included in NELAC Scope of Analysis.

Dry Weight Determination (ASTM D 2974-87) — **Aliquot ID: 46666-004** — **Matrix: Soil/Solid** — **Analyst: BMG**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Percent Moisture (Water Content) (NN)	**20**		%	0.1	1.0	10/05/11	MC111005	10/06/11	MC111005

Polychlorinated Biphenyls (PCBs) (EPA 3546/EPA 8082A) — **Aliquot ID: 46666-004** — **Matrix: Soil/Solid** — **Analyst: BDA**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Prep Date	Prep Batch	Analysis Date	Analysis Batch
1. Aroclor-1016	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
2. Aroclor-1221	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
3. Aroclor-1232	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
4. Aroclor-1242	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
5. Aroclor-1248	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
6. Aroclor-1254	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
7. Aroclor-1260	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
8. Aroclor-1262 (NN)	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A
9. Aroclor-1268 (NN)	U		µg/kg	330	10	10/05/11	PS11J05C	10/06/11	SA11J06A

Definitions/ Qualifiers:

A: Spike recovery or precision unusable due to dilution.
B: The analyte was detected in the associated method blank.
E: The analyte was detected at a concentration greater than the calibration range, therefore the result is estimated.
J: The concentration is an estimated value.
M: Modified Method
U: The analyte was not detected at or above the reporting limit.
X: Matrix Interference has resulted in a raised reporting limit or distorted result.
W: Results reported on a wet-weight basis.
***:** Value reported is outside QA limits

Exception Summary:

H : Hold time exceeded.

ACCREDITED IN ACCORDANCE WITH nelac

Accreditation Number:

E-10395

Fibertec environmental services

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1914 Holloway Drive
Holt, MI 48842
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Geoprobe
11766 E. Grand River
Brighton, MI 48116
Phone: 810 220 3300
Fax: 810 220 3311

Chain of Custody # 100835

PAGE 1 of 1

Client Name: AKT PEERLESS

Contact Person: DAVID ISABELL

Project Name/ Number: 7203F-3-20

Purchase Order#

Lab Sample #	Date	Time	Client Sample #	Client Sample Descriptor	MATRIX (SEE RIGHT CORNER FOR CODE)	# OF CONTAINERS	PRESERVED (Y/N)	PARAMETERS: PCBs
	9/19/11			AKT-4 (2-2.5)	S	2	Y	X
	9/19/11			AKT-4 (8.5-9)	S	2	Y	X
	9/28/11			TP-2 (2-3)	S	1	N	X
	9/28/11			TP-2 (8-9)	S	1	N	X

Turnaround:
- [ ] 24 hour RUSH (surcharge applies)
- [ ] 48 hour RUSH (surcharge applies)
- [ ] 72 hour RUSH (surcharge applies)
- [ ] Standard (5-7 bus days)
- [X] Other: Specify

Matrix Code: S Soil; GW Ground Water; W Water; SW Surface Water; A Air; WW Waste Water; O Oil; X Other: Specify; P Wipe

Remarks: ★ NEED RESULTS BY FRIDAY AM

Comments:

Relinquished By: DAVID ISABELL	Date/ Time 10/4/11	Received By: Dakotta Shrader 10/4/11 2:30
Relinquished By: Dakotta Shrader	Date/ Time 10/4/11 3:50	Received By:
Relinquished By:	Date/ Time	Received By Laboratory:

LAB USE ONLY:
Fibertec project number:
Laboratory Tracking:
Temperature at Receipt: 4.2C

COC Revision: April, 2006

TERMS & CONDITIONS ON BACK

01010106